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**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	September 22, 2011	
Proposer's Name	Harold R. Peden, Councilman	
Company Affiliation (if any):	The Borough of Upland	
Address:	224 Castle Avenue, Upland, Delaware County, PA 19015	
Telephone:	610-304-6078	
Email:	hrpeden@comcast.net	
ICC Code:	All	
ICC Code Change Number :	All	
Code Section(s):	All	
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change	<input type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

My BCO has attended the classes on the 2012 UCC changes and considering the impact(s) on our borough and the general positive consequences of adopting the changes, has recommended the adoption of all changes.

I am responding in support of the changes because of my close working relationship with our code officials and inspectors.

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
Bureau of Occupational & Industrial Safety
PA Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

	RAC Use Only	
Submission Method:	Public Hearing:	Date Received: 9-22-11
	E-Mail: <input checked="" type="checkbox"/>	

Subject: FW: PAUCC 2012 Code Change

From: "LI, UCCRAC" <RA-UCCRAC@pa.gov>

Date: 9/22/2011 10:12 AM

To: "Smith, Kelly K (LI-OCC)" <kellysmith@pa.gov>, "uccrac@comcast.net" <uccrac@comcast.net>

From: Jeff Shultz[SMTP:JSHULTZ@EASTPENNSBORO.NET]

Sent: Thursday, September 22, 2011 10:12:43 AM

To: LI, UCCRAC

Cc: Jeff Shultz

Subject: PAUCC 2012 Code Change

Auto forwarded by a Rule

PENNSYLVANIA UNIFORM CONSTRUCTION CODE

2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:

September 22,, 2011

Proposer's Name

Company Affiliation (if any):

Address:

Telephone:

Email:

Jeffrey S. Shultz

East Pennsboro Township

98 South Enola Drive

Enola, PA 17025

JshultzEastpennsboro.net

ICC Code:

PAUCC

ICC Code Change Number :

NA

Code Section(s):

②

House Bill #85, Section 502 of the Act

This is a Recommendation:

To Adopt the Change

To Not Adopt the Change

For the Following Reasons:

(Provide Details Below)

Health Safety and Welfare

Technical Feasibility

Economic and Financial Impacts

Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

I would like to see the time limit for review, approval/denial of Residential permits (bearing a design professional's seal) be extended from the current 5 day period to 10 days. Municipality budgets and work force are stretched to the limits due to the economic situation we are all experiencing. Many Code Officials are called on to perform far many duties than merely construction code related items. Time is not always available to perform an accurate, compliant code review. A hasty approval could result in unnecessary costs during a field inspection, thus delaying the construction process as a whole. The quality control performed by Code Officials is for the health, safety, and welfare of the residents of the Commonwealth. Recent, uncommon rains and flooding require immediate attention. Commercial "designed" plans allow for 30 day review/approval/denial. I would ask that the original 15 day requirement for residential, currently 5 days, be re-written to 10 days.

Thank you

Jeff Shultz

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	September 28, 2011
Proposer's Name	Brian O'Neill
Company Affiliation (if any):	South Middleton Township
Address:	520 Park Drive
Telephone:	(717) 258-5324
Email:	<u>engineer@smiddleton.com</u>
ICC Code:	IRC
ICC Code Change Number :	Appendix J
Code Section(s):	Section AJ 501.7
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change <input type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare <input checked="" type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input type="checkbox"/> Economic and Financial Impacts <input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

In the **2006** IRC, Section R305 deals with ceiling heights. Section R305.1 reads as follows:

R305.1 Minimum height. *Habitable rooms, hallways, corridors, bathrooms, toilet rooms, laundry rooms and basements shall have a ceiling height of not less than 7 feet (2134 mm). The required height shall be measure from the finish floor to the lowest projection from the ceiling.*

With the following exception:

1. *Beams and girders spaced not less than 4 feet (1219 mm) on center may project not more than 6 inches (152 mm) below the required ceiling height.*

This exception was especially relevant in existing basements and those basements that were 8 feet in height. It is very difficult to achieve 7 foot clearance around beams, considering framing, flooring, drywall, etc.

The **2009** code changed this section and removed this exception. As a result, we have had several building code appeals since the effective date of this code. The appeals were to allow residents to lower the ceiling height in a habitable basement to 6 feet 8 inches. This was to deal with issues of ducts and/or beams projecting below 7 feet.

To assist the Appeals Board in their decision, the Board has relied upon a provision contained in Appendix J of the IRC. Specifically, Section AJ501.7 states the following:

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Submission Method:	Public Hearing:	Date Received: 9-28-11
	E-Mail: <input checked="" type="checkbox"/>	

AJ 501.7 Ceiling Height. Habitable spaces created in existing basements shall have ceiling heights of not less than 6 feet 8 inches (2032 mm). Obstructions may project to within 6 feet 4 inches (1930 mm) of the basement floor. Existing finished ceiling heights in nonhabitable spaces in basements shall not be reduced.

While this section seems pretty straight forward in allowing the ceiling height to be reduced, it is contained in Appendix J of the code. This Appendix has NOT been adopted as part of the Uniform Construction Code of Pennsylvania. Therefore, our code officials may not rely on this when issuing permits. Only Appendices E & H were specifically adopted.

While the Appeals Board feels that the issue is pretty straight forward, every time the situation arises, the Board must meet and hear on the individual cases. We have established a \$250 application fee for a residential code appeal. So, a resident must pay this application fee. The residents in our most recent case asked our Board of Supervisors to waive the fee. However, the fee did not even cover our expenses for the hearing, the Board denied this request.

The easiest solution to resolve this issue is to adopt Appendix J. Or, more specifically, adopt Section AJ 501.7 of Appendix J.

I don't know if the 2012 code addresses this problem.

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Submission Method:	Public Hearing:	Date Received:
	E-Mail:	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	09/30/11
Proposer's Name	Albert Wrightstone
Company Affiliation (if any):	Susquehanna Township
Address:	1900 Linglestown Road, Harrisburg, PA 17110
Telephone:	717 909 9226
Email:	<u>AWrightstone@Susquehannatwp.com</u>
ICC Code:	2012 Codes
ICC Code Change Number :	
Code Section(s):	
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change <input type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input checked="" type="checkbox"/> Health Safety and Welfare <input checked="" type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts <input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

The 2012 Codes should be adopted "as is" with no changes unless there is something that clearly does not apply to Pennsylvania. The ICC Codes are interconnected and sections are referenced in each of the other codes in many situations. It is important for design professionals, contractors, code enforcement officials and the general public that the codes not be chopped up and portions enforced/not enforced. The ICC Codes are true national standards that define the various aspects of construction.

Only adopting portions of codes will create confusion among those parties. In addition, there will be extended review time with delays in the review process, and confusion during inspections, which will only serve to ultimately cost more money to the consumer, be it a homeowner, business person, developer, etc. In addition, failure to adopt true national standards could result in substandard construction and create civil liability that will only create needless legal litigation and serve to hinder progress.

Given the recent floods and earthquake and concerns about energy conservation, including development of the green building code, it is essential that the most recent codes be implemented. Many areas of life, such as in manufacturing, consumer protection, etc. are guided by national standards. This is mandatory in operating in a global economy. Those who would undermine national standards under the guise of "saving money" do not provide a reasonable alternative. It is essential that certain standards, such as energy conservation be enhanced through time. Energy is a big cost factor in the economy not only of Pennsylvania but the entire United States.

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Submission Method:	Public Hearing:	Date Received: 9-30-11
	E-Mail: <input checked="" type="checkbox"/>	

Of course energy is just a part of the overall codes and one example of the development of the codes through the 24 years I have been a code enforcement officer. Many other areas of construction have advanced as well, and new products . abound in the construction industry. It is essential that that laws and regulations governing construction keep up with the technology, and that can only be done by adopting the most recent codes.

Thank you.

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Submission Method:	Public Hearing:	Date Received:
	E-Mail:	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	October 18, 2011	
Proposer's Name	Mark F. Harris	
Company Affiliation (if any):	Cathedral Park Association	
Address:	P.O. Box 11796, Philadelphia, PA 19101-0796	
Telephone:	215-683-5197	
Email:	MarkFrogHarris@Verizon.net	
ICC Code:	903.3	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input type="checkbox"/> Economic and Financial Impacts	<input checked="" type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Currently only NFPA series 13 type sprinkler systems are permitted for low-rise multi-unit dwellings, including townhouses. I propose allowing NFPA 750 type systems as an alternative. This would allow lower cost systems, smaller water services, and reduced water damage.

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651 Boas Street, Room 1613
Harrisburg, PA 17121

RAC Use Only		
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 10-17-11

Subject: Re: NFPA 750

From: UCC RAC Chairman Frank Thompson <uccrac@comcast.net>

Date: 10/24/2011 10:47 AM

To: "incoming.yahoo.verizon.net" <markfroharris@verizon.net>

Mark,

The Council is very limited in the changes we can consider for adoption in PA. Only those changes that have been added to the ICC model codes since the previously published edition. We are now reviewing changes to the 2012 editions from 2009. I see that NFPA 750 is not a referenced standard in the 2012 or 2009 International Building Code. So the first step would be to have it referenced and included as part of the IBC for 2015 or ask the PA General Assembly to adopt the provisions by legislation. Hope this helps you understand.

Frank C. Thompson, Chairman

On 10/18/2011 10:03 PM, incoming.yahoo.verizon.net wrote:

I do not know much about the technicalities here. I am from a community group that wants to get a low-cost housing program going. Could you give me a little guidance?

-----Original Message-----

From: UCC RAC Chairman Frank Thompson [<mailto:uccrac@comcast.net>]

Sent: Tuesday, October 18, 2011 8:33 AM

To: MarkFrogHarris@Verizon.net

Subject: Re: NFPA 750

Mark,

Thanks for your submission. I did not see a correct ICC Code or code change number on your submission but if there is please provide it on the form. The Council is limited to considering only ICC approved changes for adoption in the 2012 codes.

Sincerely,

Frank C. Thompson, Chairman

UCC Review and Advisory Council

On 10/17/2011 5:28 PM, LI, UCCRAC wrote:

From: Mark.Harris@phila.gov[SMTP:MARK.HARRIS@PHILA.GOV]

Sent: Monday, October 17, 2011 5:28:00 PM

To: LI, UCCRAC

Subject: NFPA 750

Auto forwarded by a Rule

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	October 24, 2011
Proposer's Name	Thomas F. Masano
Company Affiliation (if any):	Masano Architects Group, Inc.
Address:	855 Berkshire Blvd., Suite 102, Wyomissing, PA 19610
Telephone:	610.376.4699
Email:	magarch@comcast.net
ICC Code:	
ICC Code Change Number :	
Code Section(s):	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change <input type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare <input type="checkbox"/> Technical Feasibility <input type="checkbox"/> Economic and Financial Impacts <input checked="" type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Thank you for Notice and our input, but NO CHANGE- Stop for awhile
 To Tedious- Like a punishment
 Throw in Land Development and OSHA too tough
 Enough- Constant changes, can't keep up
 40 years of Code maturity- Good & comprehensive already
 Academics- A reason for their existence
 Publishing/ Tenure
 Too much regulation, making process for Owners too time consuming & costly
 Only ones that can afford are corporations

Please pause. Things/ Process are getting nuts (un-American)

Thank you for your consideration- Thomas F. Masano.

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 PA Department of Labor and Industry
 651 Boas Street, Room 1613
 Harrisburg, PA 17121

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Submission Method:	Public Hearing:	Date Received: 10-24-11
	E-Mail: <input checked="" type="checkbox"/>	

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	28 October		
Proposer's Name	John R. Waters, CFPS, EFO, MS		
Company Affiliation (if any):	Upper Merion Fire and Rescue Services		
Address:	175. W. Valley Forge Road, King of Prussia, PA 19406		
Telephone:	610-205-8513		
Email:	jwaters@umtownship.org		
ICC Code:	International Residential Code		
ICC Code Change Number :			
Code Section(s):	R313		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input type="checkbox"/> To Not Adopt the Change	
For the Following Reasons:	<input checked="" type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
(Provide Details Below)	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This is not a change in the code, but simply a recommendation that this section not be deleted by the Advisory Council. It has been well-known that the fire problem in PA is residential in nature. The newer synthetic materials are lessening the time to flashover, the point at which a fire turns deadly. Study after study has shown that even a fully career fire department cannot interdict the progress of a fire before flashover. Every major fire protection entity in the US has endorsed residential sprinklers; they are the experts, let us follow their advice. Kindly see the attached graph to show documented time-lines to flashover compared with fire department response.

An action to delete residential sprinklers demonstrates a willingness to accept the status quo in fire protection. Kindly remember, structure fires begin as contents fires, they don't attack the building until flashover is reached. We must prevent flashover if we are to be successful in saving lives.

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 Harrisburg, PA 17121

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 10-28-11

Subject: Code Change Recommendation Form submitted

From: UCC RAC Chairman Frank Thompson <uccrac@comcast.net>

Date: 10/28/2011 10:20 AM

To: JWATERS@UMTOWNSHIP.ORG

BCC: Kelly Smith <kellysmith@state.pa.us>

Dear John,

Thanks for your submission. The Council is only reviewing changes in the 2012 I-Codes for consideration of adoption in PA which this is not. If there is a 2012 change that you wish to make a recommendation on, please reference the ICC Code Change number on the Recommendation Form. The section you reference has been deleted by statute. The Council is limited by statute to only consider ICC adopted code changes since that 2009 codes.

Sincerely,

Frank C. Thompson, Chairman

UCC Review and Advisory Council

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	November 7, 2011
Proposer's Name	AIA Pennsylvania, Alliance to Save Energy, Building Codes Assistance Project, American Chemistry Council, American Council for an Energy-Efficient Economy, Bayer, Citizens for Pennsylvania's Future, City of Philadelphia, Delaware Valley Green Building Council, Energy Coordinating Agency, Energy Efficient Codes Coalition, Keystone Energy Efficiency Alliance, Natural Resources Defense Council, Northeast Energy Efficiency Partnerships, PennEnvironment, Pennsylvania Chemical Industry Council, Pennsylvania Association of Fire Code Officials, Pennsylvania Fire and Emergency Services Institute Responsible Energy Codes Alliance
Company Affiliation (if any):	For Questions about the substance of the proposal, contact Eric Lacey, Responsible Energy Codes Alliance
Address:	1850 M Street, NW, Suite 600, Washington, DC 20036
Telephone:	202-339-6366
Email:	eric@reca-codes.com
ICC Code:	2012 International Residential Code
ICC Code Change Number :	RE4
Code Section(s):	Delete Chapter 11 of 2009 IRC and replace with Chapter 11 of 2012 IRC
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change <input type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input checked="" type="checkbox"/> Health Safety and Welfare <input checked="" type="checkbox"/> Technical Feasibility <input checked="" type="checkbox"/> Economic and Financial Impacts <input checked="" type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

	RAC Use Only	
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-7-11

The proponents listed above urge the Uniform Construction Code Review and Advisory Council to adopt Chapter 11 of the 2012 IRC with no weakening amendments. As a result of code change proposal RE4, Chapter 11 of the IRC was made entirely consistent with the 2012 IECC. ICC has republished the residential energy efficiency requirements in full in Chapter 11 of the IRC.

This is an important change, and it will bring about significant energy savings in a single code change proposal. As a result of recent amendments to the statutes related building codes, the Council has limited time to review and analyze hundreds of potential improvements to Pennsylvania's current building and energy codes. **Because the International Codes, including building and residential codes and their companion mechanical, plumbing, and electrical codes, are designed to operate as an integrated, self-referencing set of building requirements, it is essential for uniformity, coordination, and the elimination of conflicting requirements that all of these are adopted together without technical modification. Therefore, the most effective use of the Council's limited time and resources is to consider the updated Chapter 11 of the IRC as a single improvement to Pennsylvania's building energy efficiency standards.** We urge the Council to take advantage of this opportunity to improve Pennsylvania's residential building energy standards with the adoption of a single proposal.

The adoption of the 2012 IRC Chapter 11 will bring Pennsylvania homeowners and building operators a wide range of benefits, and will help the Commonwealth reach its energy efficiency goals. This action is also crucial to bringing Pennsylvania into compliance with its obligations under Federal Law. Under the Federal Energy Policy Act of 1992, The U.S. Department of Energy is required to review each new edition of the model codes – ASHRAE Standard 90.1 for commercial construction and the IECC for residential. If DOE determines that the most recent model code would achieve greater energy savings than the previous edition, this determination triggers certain requirements on the part of states. For residential construction, if DOE publishes a determination under 42 U.S.C. 6833(a) that finds the latest IECC achieves greater energy savings, states have two years to certify that it has reviewed and updated the provisions of their residential building energy codes and made a determination as to whether to update the energy code to meet or exceed the latest IECC. In October 2011, DOE made a preliminary affirmative determination on the 2012 IECC. See 76 Fed. Reg. 64924 (Oct 19, 2011). Once this determination is finalized (likely in early 2012), Pennsylvania will have two years to make this certification – likely in early 2014. ***If Pennsylvania does not adopt the above proposal or otherwise update its residential energy requirements, Pennsylvania may not have another opportunity until after the 2014 deadline to update its code.*** For more information on DOE's residential IECC determination process and state certifications, see http://www.energycodes.gov/status/determinations_res.stm.

The specific criteria outlined in Section 107(B)(3) of the Pennsylvania Construction Code Act apply to this proposal as follows:

1. The impact that the provision may have upon the health, safety, and welfare of the public.

Several improvements to residential building practices will have positive effects on the health, safety, and welfare of the commonwealth's citizens.

- **Improvements to the permanent thermal building envelope, including better window requirements and stronger insulation requirements, will bring efficiency benefits over the lifetime of Pennsylvania homes.** The 2012 IRC Chapter 11 improves insulation requirements for more efficient attics, walls, basements, and crawl spaces. These measures are most cost-effective at initial construction, and will yield energy savings for the useful lifetime of the home. The 2012 IRC Chapter 11 also includes tighter window U-factors and a moderate limitation on solar heat gain (SHGC) in climate zone 4, typically at no extra cost for the window. This requirement can contribute to reduced HVAC equipment cost where equipment is sized properly. This will also help control Pennsylvania's summer peak electric demand, allow cooling systems to be sized smaller, and will keep homes more comfortable during the summer months.
- **Homes will use less energy as the thermal envelope is tightened and verified by air leakage testing.** Under the 2012 IRC Chapter 11, Pennsylvania homes will be tightly sealed with tested air leakage meeting a reasonable

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	E-Mail:	

performance standard. Air leakage testing is objective and more reliable than a visual inspection, will reduce the burden on code officials to inspect for air leakage, and the energy savings will be substantial in many cases.

- **Ducts will leak less in HVAC distribution systems.** As in the 2009 IECC and IRC, duct testing is required unless ducts and air handler are located inside conditioned space. The improved duct tightness standard in the 2012 IECC and Chapter 11 of the 2012 IRC will result in more efficient delivery of heated or cooled air to the entire house, reducing the amount of energy used to heat and cool and helping to avoid the need for occupants to adjust the thermostat to address discomfort.
- **Hot water systems will deliver hot water without unnecessarily wasting energy.** The 2012 IRC implements modest requirements for hot water distribution systems for the first time. Hot water pipes must be insulated or the hot water distribution must be more efficient.
- **More efficient lighting will bring simple and effective energy savings.** The 2012 IRC increases the percentage of lighting required to have high-efficacy bulbs from 50 to 75%. This relatively simple measure saves substantial energy.

2. The economic and financial impact of the provision.

- As highlighted above, improvements to the building thermal envelope are most cost-effective at initial construction. For example, a study by ICF International Consulting and the Building Codes Assistance Project shows that the incremental cost increase for a typical Philadelphia row house built to the 2012 IECC (with which the 2012 IRC is equivalent) is between \$1,222 and \$1,847. However, with annual energy cost savings between \$194 and \$205, these measures will be completely offset within the first four years of the home's useful life. More importantly for Pennsylvania's citizens, these modern and efficient homes will continue to pay benefits to homeowners for decades to come. After 30 years, the homeowner will have saved up to \$3,500 beyond the cost of the efficiency improvements. The result will be similar across the Commonwealth. These improvements are smart investments in Pennsylvania's energy future. A copy of the ICF/BCAP analysis is attached to this proposal.

3. The technical feasibility of the provision.

- Each provision of the 2012 IRC Chapter 11 has undergone several rounds of review, and ultimately every proposal has been approved, disapproved, or modified by a representative body of the nation's building officials and governmental officials. Many of these officials are Pennsylvania citizens. The ICC's consensus-driven process ensures that each section of the code is technically feasible, understandable, and enforceable.
- Many resources are available to assist builders, designers, and code officials to understand the technical components of the 2012 IECC and IRC. For example, the U.S. Department of Energy offers, free of charge, building code policy guides for policy makers and code officials, a guide to meeting the air leakage requirements of the 2012 IECC/IRC, and a guide to HVAC controls for plans examiners and building inspectors. These resources and more can be found at <http://www.energycodes.gov/publications/resourceguides/>.

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Date Submitted:	November 7, 2011
Proposer's Name	AIA Pennsylvania, Alliance to Save Energy, Building Codes Assistance Project, American Chemistry Council, American Council for an Energy-Efficient Economy, Bayer, Citizens for Pennsylvania's Future, City of Philadelphia, Delaware Valley Green Building Council, Energy Coordinating Agency, Energy Efficient Codes Coalition, Keystone Energy Efficiency Alliance, Natural Resources Defense Council, Northeast Energy Efficiency Partnerships, PennEnvironment, Pennsylvania Chemical Industry Council, Pennsylvania Association of Fire Code Officials, Pennsylvania Fire and Emergency Services Institute Responsible Energy Codes Alliance
Company Affiliation (if any):	For Questions about the substance of the proposal, contact Eric Lacey, Responsible Energy Codes Alliance
Address:	1850 M Street, NW, Suite 600, Washington, DC 20036
Telephone:	202-339-6366
Email:	eric@reca-codes.com
ICC Code:	2012 International Energy Conservation Code
ICC Code Change Number :	EC3, EC9, EC13, EC18, EC20, EC22, EC27, EC30, EC34, EC35, EC41, EC42, EC45, EC47, EC50, EC63, EC66, EC68, EC70, EC85, EC86, EC88, EC92, EC99, EC106, EC108, EC109, EC112, EC121, EC124, EC128, EC129, EC137, EC138, EC139, EC147, EC154, EC157, EC159, EC165, EC173, EC174, EC176, EC185, EC186, EC187, EC191, EC192, EC193, EC196, EC200, EC202, EC204, EC207, EC211, EC212, EC216, EC218, EC220, EC221, EC223, ADM39.
Code Section(s):	Delete all sections of 2009 IECC and replace with all sections of 2012 IECC
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change <input type="checkbox"/> To Not Adopt the Change

	RAC Use Only	
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-7-11

For the Following Reasons: (Provide Details Below)	<input checked="" type="checkbox"/> Health Safety and Welfare	<input checked="" type="checkbox"/> Technical Feasibility
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input checked="" type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

The proponents listed above urge the Uniform Construction Code Review and Advisory Council to adopt the complete 2012 IECC with no weakening amendments. As a result of recent amendments to the statutes related building codes, the Council has limited time to review and analyze hundreds of potential improvements to Pennsylvania's current building and energy codes. **Because the IECC is designed to operate as an integrated, self-referencing set of building energy efficiency requirements that are consistent with Pennsylvania's adoption of the building and residential codes and their companion mechanical, plumbing, and electrical codes, it is essential for uniformity, coordination, and the elimination of conflicting requirements that all of these are adopted together without technical modification. Therefore, the most effective use of the Council's limited time and resources is to consider the IECC as a single improvement to Pennsylvania's building standards.**

The adoption of the 2012 IECC will bring Pennsylvania homeowners and building operators a wide range of benefits, and will help the Commonwealth reach its energy efficiency goals. This action is also crucial to bringing Pennsylvania into compliance with its obligations under Federal Law. Under the Federal Energy Policy Act of 1992, The U.S. Department of Energy is required to review each new edition of the model codes – ASHRAE Standard 90.1 for commercial construction and the IECC for residential. If DOE determines that the most recent model code would achieve greater energy savings than the previous edition, this determination triggers certain requirements on the part of states.

Commercial. For commercial construction, if DOE publishes a determination under 42 U.S.C. 6833(b) that finds the latest ASHRAE Standard 90.1 achieves greater energy savings, states have two years to demonstrate, and certify to DOE that they have reviewed the energy efficiency provisions of their commercial building code, and that the state's code meets or exceeds the requirements of ASHRAE Standard 90.1. In October 2011, DOE made an affirmative determination on ASHRAE Standard 90.1-2010, which means that Pennsylvania must certify that its commercial energy provisions meet or exceed those of ASHRAE Standard 90.1-2010 by October 18, 2013. See 76 Fed. Reg. 64904 (Oct 19, 2011). The proposal above will help Pennsylvania achieve this requirement because the 2012 IECC commercial requirements are, on the whole, as efficient or more efficient than the requirements of 90.1-2010. ***If Pennsylvania does not adopt the above proposal or otherwise update its commercial energy requirements, Pennsylvania could conflict with this important federal law.*** For more information on DOE's nonresidential ASHRAE Standard 90.1 determination notice and state certification process, see http://www.energycodes.gov/status/determinations_com.stm.

Residential. For residential construction, if DOE publishes a determination under 42 U.S.C. 6833(a) that finds the latest IECC achieves greater energy savings, states have two years to certify that it has reviewed and updated the provisions of their residential building energy codes and made a determination as to whether to update the energy code to meet or exceed the latest IECC. In October 2011, DOE made a preliminary affirmative determination on the 2012 IECC. See 76 Fed. Reg. 64924 (Oct 19, 2011). Once this determination is finalized (likely in early 2012), Pennsylvania will have two years to make this certification – likely in early 2014. ***If Pennsylvania does not adopt the above proposal or otherwise update its residential energy requirements, Pennsylvania may not have another opportunity until after the 2014 deadline to update its code.*** For more information on DOE's residential IECC determination process and state certifications, see http://www.energycodes.gov/status/determinations_res.stm.

The specific criteria outlined in Section 107(B)(3) of the Pennsylvania Construction Code Act apply to this proposal as follows:

1. The impact that the provision may have upon the health, safety, and welfare of the public.

Several improvements to residential building practices will have positive effects on the health, safety, and welfare of the commonwealth's citizens.

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	E-Mail:		

- **Improvements to the permanent thermal building envelope, including better window requirements and stronger insulation requirements, will bring efficiency benefits over the lifetime of Pennsylvania homes.** The 2012 IECC improves insulation requirements for more efficient attics, walls, basements, and crawl spaces. These measures are most cost-effective at initial construction, and will yield energy savings for the useful lifetime of the home. The 2012 IECC also includes tighter window U-factors and a moderate limitation on solar heat gain (SHGC) in climate zone 4, typically at no extra cost for the window. This requirement can contribute to reduced HVAC equipment cost where equipment is sized properly. This will also help control Pennsylvania's summer peak electric demand, allow cooling systems to be sized smaller, and will keep homes more comfortable during the summer months.
- **Homes will use less energy as the thermal envelope is tightened and verified by air leakage testing.** Under the 2012 IECC, Pennsylvania homes will be tightly sealed with tested air leakage meeting a reasonable performance standard. Air leakage testing is objective and more reliable than a visual inspection, will reduce the burden on code officials to inspect for air leakage, and the energy savings will be substantial in many cases.
- **Ducts will leak less in HVAC distribution systems.** As in the 2009 IECC, duct testing is required unless ducts and air handler are located inside conditioned space. The improved duct tightness standard in the 2012 IECC will result in more efficient delivery of heated or cooled air to the entire house, reducing the amount of energy used to heat and cool and helping to avoid the need for occupants to adjust the thermostat to address discomfort.
- **Hot water systems will deliver hot water without unnecessarily wasting energy.** The 2012 IECC implements modest requirements for hot water distribution systems for the first time. Hot water pipes must be insulated or the hot water distribution must be more efficient.
- **More efficient lighting will bring simple and effective energy savings.** The 2012 IECC increases the percentage of lighting required to have high-efficacy bulbs from 50 to 75%. This relatively simple measure saves substantial energy.

Specific improvements incorporated into the 2012 IECC for non-residential buildings in Pennsylvania include the following:

- **An improved thermal envelope will lower operating costs over the useful life of the building.** The 2012 IECC includes improvements to nearly every major component in the building, particularly the permanent thermal building envelope. A simplified fenestration table, improved insulation requirements, and improved air barrier requirements will ensure that buildings remain efficient for many years.
- **Updated and improved equipment efficiency.** The 2012 IECC tracks the latest technology for heating, cooling, and water heating equipment.
- **New technical upgrades.** For the first time, the IECC commercial chapter includes provisions for HVAC commissioning and new requirements related to skylights and daylighting.
- **Innovative options.** Users of the 2012 IECC will select and implement one of three new innovative options to bring additional energy savings: high performance lighting, high performance HVAC equipment, or the implementation of on-site renewable energy.

2. The economic and financial impact of the provision.

- As highlighted above, improvements to the building thermal envelope are most cost-effective at initial construction. For example, a study by ICF International Consulting and the Building Codes Assistance Project shows that the incremental cost increase for a typical Philadelphia row house built to the 2012

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IECC is between \$1,222 and \$1,847. However, with annual energy cost savings between \$194 and \$205, these measures will be completely offset within the first four years of the home's useful life. More importantly for Pennsylvania's citizens, these modern and efficient homes will continue to pay benefits to homeowners for decades to come. After 30 years, the homeowner will have saved up to \$3,500 beyond the cost of the efficiency improvements. The result will be similar across the Commonwealth. These improvements are smart investments in Pennsylvania's energy future. A copy of the ICF/BCAP analysis is attached to this proposal.

3. The technical feasibility of the provision.

- Each provision of the 2012 IECC has undergone several rounds of review, and ultimately every proposal has been approved, disapproved, or modified by a representative body of the nation's building officials and governmental officials. Many of these officials are Pennsylvania citizens. The ICC's consensus-driven process ensures that each section of the code is technically feasible, understandable, and enforceable.
- Many resources are available to assist builders, designers, and code officials to understand the technical components of the 2012 IECC. For example, the U.S. Department of Energy offers, free of charge, building code policy guides for policy makers and code officials, a guide to meeting the air leakage requirements of the 2012 IECC, and a guide to HVAC controls for plans examiners and building inspectors. These resources and more can be found at <http://www.energycodes.gov/publications/resourceguides/>.

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
 Bureau of Occupational & Industrial Safety
 PA Department of Labor and Industry
 651 Boas Street, Room 1613
 Harrisburg, PA 17121

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Submission Method:	Public Hearing: E-Mail:	Date Received:

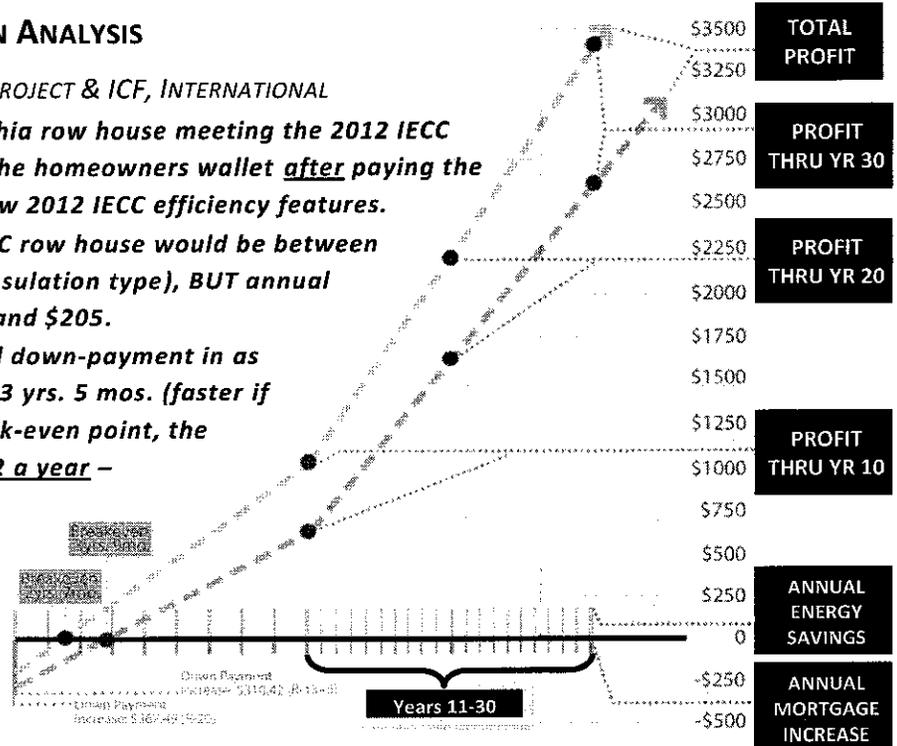
PHILADELPHIA SHOULD ADOPT THE 2012 IECC *NOW*

New Homes Built Today Will Last 70-80 Years . . . Affect Philadelphia's Energy Grid Through 2072-2082

THE ENERGY EFFICIENT CODES COALITION ANALYSIS

CONDUCTED BY THE BUILDING CODE ASSISTANCE PROJECT & ICF, INTERNATIONAL

- **Utility bill savings from a new Philadelphia row house meeting the 2012 IECC will add between \$2,603 and \$3,995 to the homeowners wallet after paying the additional mortgage needed to cover new 2012 IECC efficiency features.**
- **Incremental cost of an average 2012 IECC row house would be between \$1,222 and \$1,847 (depending on wall insulation type), BUT annual energy savings would be between \$194 and \$205.**
- **Utility savings will recoup the additional down-payment in as short as 1 yr. 10 mos. and no more than 3 yrs. 5 mos. (faster if down payment is under 20%). After break-even point, the owner will pocket between \$99 and \$142 a year – even more if energy prices increase – money that can be saved for college, spent on furniture, or used to pay the mortgage down more quickly.**

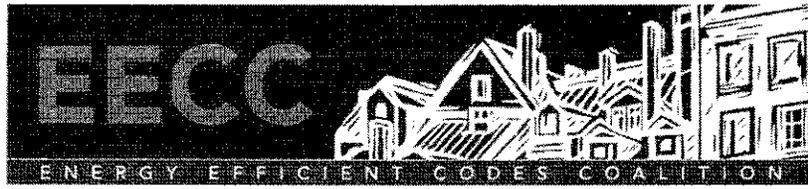


THE 2012 IECC'S BENEFITS TO:

- **Philadelphia Homeowners – Thousands of dollars in pocketed savings from lower utility bills after paying for efficiency improvements**
- **Main Street Businesses, Manufacturers, Other Homeowners – Reduced energy use from new homes will help stabilize energy costs for all Philadelphians.**
- **Utility Grid – A Institute for Electric Efficiency analysis found that all future US electricity needs through 2025 can be met by combination of better building energy codes (like 2012 IECC) and appliance standards. Translation: NO NEW POWER PLANTS.**
- **A Nation Overly Dependent on Energy Imports – Homes & Commercial Buildings are America's largest consumer of energy (over 40%), natural gas (over 50%) and electricity (over 70%).**

THE 2012 IECC – DEVELOPED BY LOCAL/STATE OFFICIALS FROM PENNSYLVANIA & ACROSS THE US

- **The 2012 IECC –30% more energy efficient than the 2009 IECC that is currently in effect in Philadelphia.**
- **Builds on, But Improves 2009 Framework**
- **A "Whole-House" Solution Employing Proven, Readily-Available Improvements.**
 - ✓ Better Thermal Envelope – windows, doors, insulation
 - ✓ Demonstrated Reduction in Air Leakage
 - ✓ Tighter Air Barriers, Air Sealing (similar to Energy Star)
 - ✓ Insulated hot water piping
 - ✓ Greater lighting efficiency
 - ✓ More information to initial/future homeowners
- **Long Lasting Improvements Made at Construction Far More Cost Effective than "Fixing Homes Later."**



Philadelphians Buying 2012 IECC Row Houses Will Save Thousands

Analysis of Cumulative Savings After Paying Incremental Construction Costs of Row Houses Meeting Historic New Building Energy Code Developed by Local/State Officials

Summary

Philadelphians buying new row houses meeting the 2012 International Energy Conservation Code (IECC) will pocket between \$2,603 and \$3,995 in net energy savings over the mortgage term, according to an analysis of energy savings and incremental construction costs by the Building Codes Assistance Project and ICF, International.

The energy savings over any added mortgage cost are enough to pay back the buyer's additional down-payment in as little as 1 year 10 months and no more than 3 years and 9 months (sooner if the loan allows less than 20% down payment). **After that date, the owner continues to pocket between \$99 and \$142 in estimated savings annually until the mortgage is paid off, when savings jump to between \$193.84 (given R-20 exterior walls) and \$204.70 (given R 13+5 exterior walls) per year.** Obviously, the savings are even greater if energy costs rise over the next 30 years.

Specifically, this analysis finds that that an average new Philadelphia row house meeting the 2012 IECC would incur incremental costs ranging from \$1,221.82 to \$1847.47, depending on wall insulation type, above a home meeting the city's current code (the 2009 IECC). This represents an increase in cost of between 0.39 and 0.59 percent for buyers of new homes.

Construction Cost Methodology – Upgrades for an “Average” New Philadelphia Row House

To calculate energy savings and incremental costs, this analysis first established an “average” new row house to approximate new development in the city. This determination was based on interviews with the City Planning department, building inspections officials, and architects currently practicing in the city. As a result of those interviews, this analysis assumes a new row house in Philadelphia is three stories in height, 16 feet wide, and 40 feet in depth. The building is also assumed to have a slab on grade foundation, a flat roof, and shared party walls with neighboring buildings. Using this model home as a baseline, we identified the building components that would have to be upgraded under the prescriptive building requirements in the 2012 IECC over those required by the city's current building energy code, the 2009 IECC. These changes included upgrades to front and rear wall insulation, third floor ceiling (roof) insulation, air sealing & testing, an increase from 50 to 75 percent compact florescent fixtures, and upgraded bathroom vent fans.

Determining Incremental Costs over an Average Home Built to Philadelphia's Current Minimum Code Requirements

Although some leading builders in Philadelphia are already exceeding the 2012 IECC, this analysis calculates the incremental cost over a home built to the requirements of the city's current code, the 2009 IECC. To estimate these incremental costs, we rely on construction costs estimates from the well-

regarded *2011 RS Means Contractor's Pricing Guide*. To approximate actual builder cost, these prices include material costs, labor, and contractor overhead and profit. For the purposes of this analysis, we confirmed many of these costs with local building suppliers in Philadelphia.

To meet the 2012 IECC, builders will have flexibility on the type of exterior wall assembly they chose to build for the front and rear of the home. At present, the 2009 IECC requires R-13 walls, which the 2012 IECC mandates must be upgraded to R-13 + 5 or R-20. To build an R-13 + 5 wall, builders retain 2 x 4 framing with R-13 fiberglass batts, but swap the conventional wood sheathing for an insulated sheathing—an engineered product that combines structural reinforcement with insulation equivalent to R-5—thus creating an R13 + 5 wall. Alternately, if builders choose to meet the R-20 requirement, 2 x 4 walls are upgraded to 2 x 6 wall construction for the front and rear walls. The larger framing allows for R-21 fiberglass batts to be placed between studs instead of the R-13 required in the 2009 IECC. Additionally, because of the superior strength of 2 x 6 construction, builders can introduce a cost-saving variant of the R-20 wall that increases the space between studs from 16 inches apart to 24 inches—thus saving lumber and dramatically reducing incremental cost. Many builders prefer to retain 16 inch spacing however, and as such three wall framing alternatives are presented in a figure 1, which summarizes incremental costs.

Although the 2012 IECC offers flexibility on wall construction, our analysis indicates that builders moving from the prescriptive requirements of the 2009 to the 2012 code will share many costs in common. Among other changes, the 2012 IECC will require builders to upgrade roof insulation from R-38 to R-49, which we estimate will cost an additional \$781 per new home. As well, we estimate that the improved air sealing standards in the 2012 IECC and the required whole house “blower door” testing will add an additional \$350 per new home.¹ To improve ventilation, an additional \$100 is expected for each house to upgrade two bathroom vent fans to units with an Energy Star rating. Finally, builders will have to install 75 percent high efficiency lights in hard-wired fixtures, up from 50 percent in the 2009 IECC. Usually, this requirement is met with compact florescent lights (CFLs). Our analysis estimates that the upgrade of 25 percent of fixtures (or 6 CFLs) will cost \$15.

While it increases cost in some areas, the 2012 IECC also presents opportunities to reduce incremental costs as a result of the improvement in the home’s building envelope. Among other possible savings, builders will be able to reduce the size of costly mechanical equipment. In this model, builders are expected to be able to reduce the size of their cooling system from 27,000 kBTUh to 24,000 kBTUh—which will allow the downsizing of the size of the system from 2.25 to 2 tons. This reduction in size will result in incremental cost savings of approximately \$204 for each new house.²

Taking into account incremental costs and savings, **this study estimates incremental costs to range from \$1,221.82 to \$1847.47, based on which wall construction type is selected by builders.** These options are \$1,221.82 (R-13 + 5 wall), \$1,837.47 (R-20 wall with 16” spacing between studs), and \$1,455.59 (R-20 wall with 24” spacing between studs). Please see appendix A for additional details on incremental cost.

Figure 1. Incremental Cost Analysis for Meeting 2012 IECC

Builder Considered	Total Area	Incremental Cost/ Sq. Ft.	Total Incremental Cost	Local Factor	Local Incremental Cost
Wall Option 1: R-13 + 5	960	\$0.04	\$40.20	117%	\$47.03
Wall Option 2: R-20 Walls with Studs spaced 16" on center	960	\$0.59	\$566.40	117%	\$662.69

Wall Option 3: R-20 Walls with Studs spaced 24" on center	960	\$0.25	\$240.00	117%	\$280.80
Roof (16' x 40')	640	\$1.22	\$780.80	117%	\$913.54
Air Sealing and Testing	N/A	N/A	N/A	N/A	\$350.00
75% CFLs (from 50%)	N/A	N/A	N/A	N/A	\$15.00
Bathroom Vent Fan Upgrade (2)	N/A	N/A	N/A	N/A	\$100.00
HVAC System Savings	N/A	N/A	N/A	N/A	-\$203.75
Total Incremental Costs (Varies by Wall Type above)					\$1,221.82 to \$1,847.47

Energy Savings

According to the model used in this analysis, **upgrading to the 2012 IECC will result in energy savings for homeowners ranging from \$193.84 per year (given R-20 exterior walls) to \$204.70 (given R-13+5 exterior walls).** In both scenarios, homeowners will realize annual savings of 22 percent on lighting electricity use, 5 percent on hot water heating, and 23 or 24 percent of savings on heating—depending on wall construction type. It is noteworthy that these savings assume constant energy prices. If prices continue to rise consistent with historical trends, savings will be greater in future years.⁴ Under this scenario, total energy savings per month would be \$17.06 or \$16.15, likewise depending on wall construction.

Mortgage Payback for Homeowners

Because new homebuyers will be able to roll incremental costs into their mortgage and realize energy savings from day one, the payback on their initial investment should occur within as little as 1 year, 10 months and no more than 3 years and 9 months.

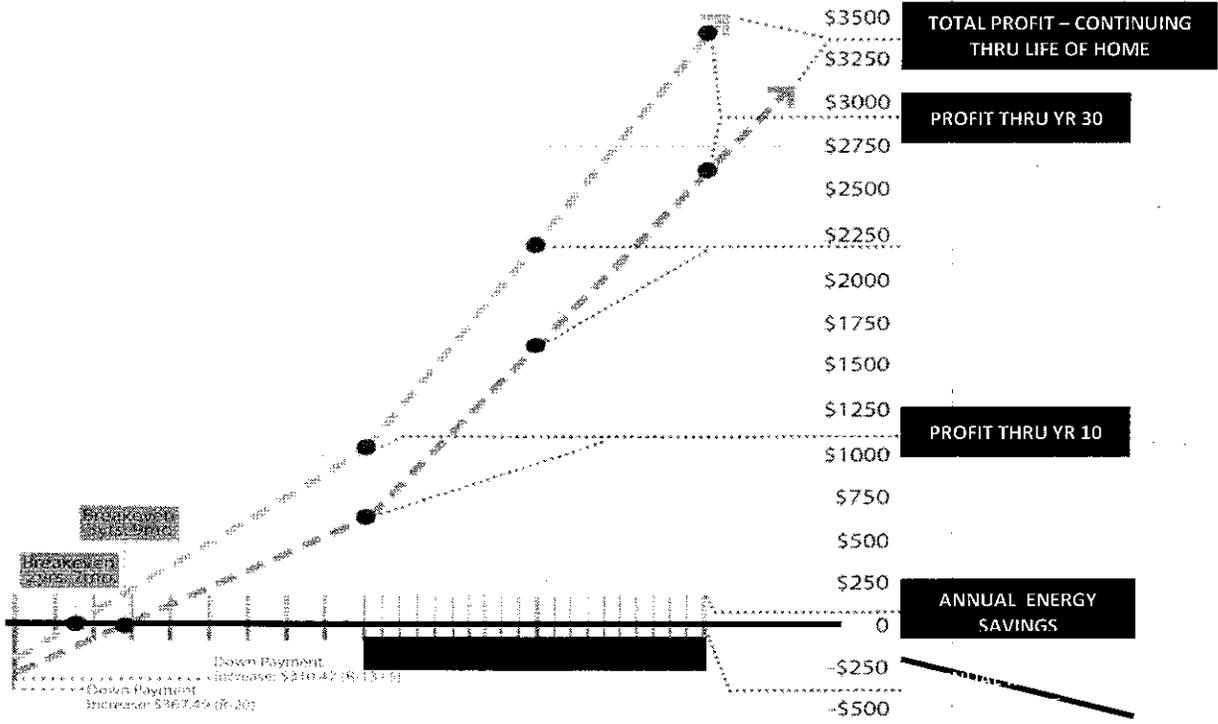
This payback analysis assumes a baseline construction cost of \$310,877 for homes currently built to the 2009 IECC. This estimate is sourced from RS Means and also includes expected land costs and developer profit.⁵ When added to this baseline home cost, incremental costs for homeowners for homes built to the 2012 IECC range from an increase of 0.39 percent to 0.59 percent of overall costs.

For a homebuyer, purchasing a new home with 20% down at an interest rate of 5.0 percent would result in a down payment increase ranging from \$244.36 to \$367.49 with additional monthly mortgage cost of between \$5.24 and \$7.89 per month. Taking into account energy savings, a cost-benefit cash flow analysis indicates that the homebuyer would break even within as little as two years and no more than three years, nine months. After breaking even, buyers would save from \$99 to \$142 per year in energy costs. Homebuyers with a lower down payment—such as 5 or 10 percent—will realize payback much more quickly. Mortgage payback to homeowners is presented below in figure 2.

Insulation Type	Incremental Costs	Monthly Energy Savings	Monthly Mortgage Note	Payback Period	Net Savings
R-13 + 5 Wall	\$1,221.82	\$17.06	\$244.36 (+ \$5.24/mo.)	1 year, 10 months	\$141.82
R-20 Wall, Studs Spaced 16"	\$1,837.47	\$16.15	\$367.49 (+ \$7.89/mo.)	3 years, 9 months	\$99.16
R-20 Wall, Studs Spaced 24"	\$1,455.59	\$16.15	\$291.12 (+ \$6.25/mo.)	2 years, 6 months	\$118.34

* Assuming 20% down payment, 30 year term, 5% annual interest rate

Summary Graphics



About the EECC

The Energy Efficient Codes Coalition (EECC) is a coalition of energy efficiency advocates involved in the development of the national model energy codes. EECC draws supporters from government, regional energy efficiency alliances, academia, think tanks, utilities, environmental groups, utilities, low-income housing groups, energy consumers, and businesses. The EECC has been heavily involved in the most recent two cycles of IECC code development. Our supporters are also deeply involved in the processes of state and local adoption and implementation of the model codes.

Contact Information:

2012 IECC Adoption and Energy Codes Policy

William D. Fay
 Energy Efficient Codes Coalition Director
 (202) 530-2214 (direct)
bfay@ase.org

Jeffrey Harris
 Senior Vice President - Programs
 Alliance to Save Energy
 (202) 530-2243
jharris@ase.org

Technical Analysis

John Miller
 Senior Research Associate
 Building Codes Assistance Project
 (202) 530-20036 (direct)
jmiller@ase.org

Appendix A: Additional Building Specifications

Figure 3: Components used to Build Wall and Roof Assemblies

Select Building Components	Cost per Square Foot
R13 Wall (2009 IECC Baseline)	
2 x 4 Studs, 16" O.C.	\$ 1.09
Plates, 2 x 4, double top, single bottom	\$ 0.41
7/16" thick OSB Sheathing	\$ 0.94
R-13 Kraft faced fiberglass batt, 3-1/2" thick, 15" wide	\$ 0.60
Total	\$ 3.04
R20 Wall (Studs 16" on center)	
2 x 4 Studs, 16" O.C.	\$ 1.09
Plates, 2 x 4, double top, single bottom	\$ 0.41
R5 Insulated Sheathing	\$ 1.10
R-13 Kraft faced fiberglass batt, 3-1/2" thick, 15" wide	\$ 0.60
Savings From Eliminating Housewrap (polyethelene vapor barrier)	(\$0.12)
Total	\$ 3.08
R20 Wall (Studs 16" on center)	
2 x 6 Studs, 16" O.C.	\$ 1.39
Plates, 2 x 6, double top, single bottom	\$ 0.52
7/16" thick OSB Sheathing	\$ 0.94
5.5" thick, R-21, 15" Kraft Faced Fiberglass Batt	\$ 0.78
Total	\$ 3.63
R20 Wall (Studs 24" on center)	
2 x 6 Studs, 24" O.C.	\$ 1.05
Plates, 2 x 6, double top, single bottom	\$ 0.52
7/16" thick OSB Sheathing	\$ 0.94
5.5" thick, R-21, 15" Kraft Faced Fiberglass Batt	\$ 0.78
Total	\$ 3.29
Above Deck Roof Insulation (addition of R11 to achieve R 49)	
R11 equivalent 1 (3" Expanded Polystyrene, R11.49)	\$ 1.25
R11 equivalent 2 (2" Polyisocyanurate, R 13)	\$ 1.19
Average	\$ 1.22

Figure 4: Cost: Baseline for 2009 IECC Compliant Home

Baseline Model	Row House
Building Area (Square Feet)	1,920

Construction Cost/Square Foot	\$100.28*
Location Factor	117%
Adjusted Cost/Square Foot	\$117.33
Total Building Cost	\$225,273.48
Including 15% Land Costs	\$259,064.51
Including Developer Profit of 20% on cost	\$310,877.41

*Assuming RS Means 3 Story Construction cost, modified for row houses at a factor of 91 percent. The exterior wall is assumed to be brick veneer

¹ \$350 is commonly used as an expected air sealing and testing requirement for new single-family detached homes nationwide. We expect that this cost may be lower in Philadelphia as the row house modeled has a small percentage of exposed wall area as compared to singly family detached homes.

² EPA conservatively estimates in their Homes Version 3 that savings for downsizing 13 SEER units are \$815 per ton. It should be noted that because HVAC systems are usually sold in half-ton increments, to meet the 2.25 tons of needed cooling capacity estimated in the baseline 2009 scenario, builders would have to install the next size up, a 2.5 ton unit. By "right-sizing" the HVAC equipment, building occupants will also benefit due to a reduction in equipment short-cycling: a scenario where equipment that is too large for a given space, turns on and off frequently, thus wasting energy and losing its ability to dehumidify indoor air.

³ RS Means costs are average costs for products across the U.S. To approximate Philadelphia-specific costs as a percentage of the national costs presented in RS Means, this analysis multiplies total cost by the RS Means location factor for Philadelphia, 117% percent of the national average.

⁴ This analysis was generated specifically for this scenario using Beacon™, a simulation program that utilizes DOE-2 to summarize annual energy costs based on expected outdoor conditions, home use, construction type, state energy prices, and other factors. As well, the model assumes that buildings are randomly oriented—thus accounting for fact that the designers are restricted by available infill lots and are less able to orient new construction to take advantage of ideal south-facing solar orientation.

⁵ This analysis assumes land costs represent 15% of construction costs provided by RS Means. Additionally, the final price assumes developers achieve a 20% profit on total construction and land costs.

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	Nov 19th, 2011	
Proposer's Name	Michael Kirby	
Company Affiliation (if any):	Probuilt Homes	
Address:	43 INDUSTRIAL CIRCLE, MIFFLINTOWN, PA	
Telephone:	1-717-363-1395	
Email:	mkirby@pro-builthomes.com	
ICC Code:	Do not adopt the 2012 I codes	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Do not adopt the 2012 I codes. It is irresponsible to change for change sake and not out of necessity. There is no reason to adopt a new code, when we still haven't fully embraced the old one yet (see House Bill 377), not to mention the codes are increasing the cost of our homes rapidly. This, combined with a bad economy and an increase raw items such as wood and oil based products like shingles, siding etc...we are asking for the housing industry to falter even more. Let's put a freeze on new codes, Let the housing industry stabilize, keep the status quo which let's us build a safe and energy efficient home.

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
Bureau of Occupational & Industrial Safety
Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

	RAC Use Only	
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-19-11

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	Nov 21st, 2011		
Proposer's Name	Joseph Weaver		
Company Affiliation (if any):	The Commodore Corporation		
Address:	PO Box 577 Goshen, In 46527		
Telephone:	1-574-533-7100		
Email:	jweaver@commodorehomes.com		
ICC Code:	Do not adopt the 2012 I codes		
ICC Code Change Number :			
Code Section(s):			
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

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 Harrisburg, PA 17121

		RAC Use Only
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-21-11

⑪

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	Nov 21th, 2011		
Proposer's Name	Randy Callen		
Company Affiliation (if any):	Structural Modulars, Inc.		
Address:	100 Southern Avenue, Strattanville, PA 16258		
Telephone:	814-764-5555		
Email:	engineering@smihomes.com		
ICC Code:	Do not adopt the 2012 I codes		
ICC Code Change Number :			
Code Section(s):			
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input type="checkbox"/> Economic and Financial Impacts	<input checked="" type="checkbox"/> Other (Specify Below)	

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Bureau of Occupational & Industrial Safety
Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

		RAC Use Only
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-21-11

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	Nov 19th, 2011		
Proposer's Name:	Aaron Trometter		
Company Affiliation (if any):	Excel Homes Group LLC		
Address:	10642 south Susquehanna Trail		
Telephone:	1-717-444-3395		
Email:	atrometter@excelhomes.com		
ICC Code:	Do not adopt the 2012 I codes		
ICC Code Change Number :			
Code Section(s):			
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Do not adopt the 2012 I codes. It is irresponsible to change for change sake and not out of necessity. There is no reason to adopt a new code, when we still haven't fully embraced the old one yet (see House Bill 377), not to mention the codes are increasing the cost of our homes rapidly. This, combined with a bad economy and an increase raw items such as wood and oil based products like shingles, siding etc...we are asking for the housing industry to falter even more. Let's put a freeze on new codes, Let the housing industry stabilize, keep the status quo which let's us build a safe and energy efficient home.

Completed forms may be e-mailed to 18-00000@pa.gov or mailed to:
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651 Bush Street, Room 1613
Harrisburg, PA 17121

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-21-11

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

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2011 NOV 17 PM 2: 12

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11-16-11	
Proposer's Name	H. Scott Hobensack	
Company Affiliation (if any):	Clinger Homes, Inc	
Address:	470 Northway Rd Ext - Linden, Pa 17744	
Telephone:	570-321-8773	
Email:	clinger-homes,inc@gmail.com	
ICC Code:		
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Not needed.

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Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

	RAC Use Only	
Submission Method:	Public Hearing:	Date Received: 11-22-11
	E-Mail: MAIL	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

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NOV 17 PM 2:12

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11-15-11	
Proposer's Name	Dennis Myers	
Company Affiliation (if any):	Clinger Homes, Inc	
Address:	470 Northway Rd Ext - Linden, Pa 17744	
Telephone:	(570) 321-8773	
Email:	clingerhomesinc@gmail.com	
ICC Code:		
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Unnecessary. The only people being penalized are the contractors that already follow the rules. Just getting too intrusive.

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	RAC Use Only	
Submission Method:	Public Hearing:	Date Received: 11-22-11
	E-Mail: MAIL	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11/20/11	
Proposer's Name	Jillian Shumard	
Company Affiliation (if any):	Lezzer Lumber	
Address:	8350 E. College Ave State College	
Telephone:		
Email:		
ICC Code:		
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Keep the same no changes

11 NOV 22 PM 2:55
RECORDING OFFICE

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Submission Method:	Public Hearing	Date Received: 11-22-11
	E-Mail: N/A	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11/21/2011	
Proposer's Name	William Cramer	
Company Affiliation (if any):	RIMCO PROPERTIES INC.	
Address:	100 SANDHILL DR PITTS. PA. 15239	
Telephone:	724-387-2555	
Email:	B.Cramer@RimcoProperties.com	
ICC Code:	R302.5.1	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

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PA Department of Labor and Industry
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Harrisburg, PA 17121

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Submission Method:	Public Hearing:	Date Received: 11-30-11
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**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11/21/2011	
Proposer's Name	JOHN M. LYNCH	
Company Affiliation (if any):	RIMCO PROPERTIES INC.	
Address:	100 SANDYNE DR PITTS. PA. 15239	
Telephone:	724-387-2555	
Email:	jlynch@rimcproperties.com	
ICC Code:	R302.5.1	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

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PA Department of Labor and Industry
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11 NOV 28 PM 3:37

	RAC Use Only	
Submission Method:	Public Hearing: E-Mail: MAIL	Date Received: 11-30-11

18

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

2011 NOV 28 PM 2:30
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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11/21/2011	
Proposer's Name:	Thomas C. Dixon	
Company Affiliation (if any):	RIMLO PROPERTIES INC.	
Address:	100 SANDYME DR PITTS. PA. 15239	
Telephone:	724-387-2555	
Email:	tdixon@rimloproperties.com	
ICC Code:	R302.5.1	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

11 NOV 28 PM 3:37
PLANNING OFFICE

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
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PA Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

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Submission Method:	Public Hearing:	Date Received: 11-30-11
	E-Mail: MAIL	

19

Commonwealth of Pennsylvania

Uniform Construction Code
Review and Advisory Council

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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	11/21/2011	
Proposer's Name	PRIMO R. SARNO SR.	
Company Affiliation (if any):	PRIMO PROPERTIES INC.	
Address:	100 SANDWINE DR PITTS. PA. 15239	
Telephone:	724-387-2555	
Email:	PSARNO@PRIMOPROPERTIES.COM	
ICC Code:	R302.5.1	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

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11 NOV 28 PM 3:37

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Submission Method:	Public Hearing:	Date Received: 11-30-11
	E-Mail: MAIL	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11/21/2011	
Proposer's Name:	Paul Wolfe	
Company Affiliation (if any):	RIMCO PROPERTIES INC.	
Address:	100 SANDYME DR. PITTS. PA. 15239	
Telephone:	724-387-2555	
Email:	RIMCO.Paul@hotmail.com	
ICC Code:	R302.5.1	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

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Submission Method:	Public Hearing:	Date Received: 11-30-11
	E-Mail: MAIL	

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	Dec 1 ST , 2011	
Proposer's Name	Jason R. Brunick	
Company Affiliation (if any):	Musselman Lumber Inc	
Address:	200 Brimmer Ave New Holland, Pa 17557	
Telephone:	717-354-4321	
Email:	Jasonb@musselmanlumber.com	
ICC Code:	2012 IRC + IBC	
ICC Code Change Number :		
Code Section(s):	R310.2.2, B1405.13.2, Table 1102.1.3	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input checked="" type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

A major technical issue to me is the window sill increasing from 24" to 36" if more than 72" above grade. We are constantly fighting with designs currently with the 24" height to meet egress with a typical single or double hung window. Increasing this to 36" will require crank out casement windows, sliding windows or 9'-0" c/g heights thru-out. I also don't agree with the IECC energy table increases. Many window manufacture's windows don't even meet .32 U-value and i'd like to see the homeowner make the decision of energy trade off's. It will take many years for a homeowner to recuperate the extra cost of ceiling insulation in their yearly savings. The window well drainage should also be up to the builder. In new construction, it is good practice to drain it down to the foundation drain, but what happens on an inspection of a remodel or retrofit? What if there isn't any foundation drainage or proper drainage.

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Department of Labor and Industry
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Harrisburg, PA 17121

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 11-30-11

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Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	11-28-2011
Proposer's Name:	JAMES L. MUFFLY, SR.
Company Affiliation (if any):	FANGLEWOOD CONST. CO., INC.
Address:	305 BUTTERNUT LANE, Muncy, PA 17756
Telephone:	570-546-3498
Email:	JMUFFLY@COMCAST.NET
ICC Code:	IRC 2012 EDITION
ICC Code Change Number:	ALL
Code Section(s):	ALL
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change <input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare <input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts <input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

PLEASE SEE ATTACHED LETTER.

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
Bureau of Occupational & Industrial Safety
Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

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Submission Method:	Public Hearing: _____ E-Mail: MAIL
Date Received:	12-1-11

November 28, 2011

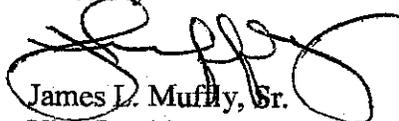
RAC Committee
Uniform Construction Code
Harrisburg, PA 17121

Dear Sirs:

I am writing to urge your committee not to adopt the 2012 version of the IRC and instead, keep the 2009 version. We have been building homes in the North Central Pennsylvania area since 1958. Throughout the years we have faced many economic downturns and weathered them well by providing outstanding work and developing a name that people could trust to do a good job for them at a reasonable cost. Up until this past year I was sure that the decision to get out of the business would be our decision, not one forced on us by the economy. After the last two years, I am not sure weather this will hold true. The Country as a whole is suffering from severe debt and a lack of confidence in the government and the economy which have had a direct effect on our business. Adopting any new regulations at this time which will increase the cost of construction could well finish us as a business and the industry as a whole.

The local area is experiencing a huge inflow due to the natural gas exploration. While this has transferred into the commercial construction market, we have not seen it translating into the homebuilding market. People are too afraid of the economy and their employment continuing to spend money on new homes or large remodeling projects. The lending institutions are not taking any risks with their lending policies. By adding any more expense to the cost of construction or the cost of doing business, we will continue to see this decline in potential customers. The homebuilding industry has always led the nation in jobs and economic development. If we are to continue to do this, we must keep housing affordable to as many people as possible. The adoption of the 2012 IRC will only add another layer of expense to all projects and further erode the market base of potential homebuyers.

Sincerely



James L. Muffy, Sr.
Vice President
Tanglewood Construction Co., Inc.

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

2011 ~~DEC~~ - 1 AM 9:56
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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	11-28-2011	
Proposer's Name:	JAMES L. MUFFLY, JR.	
Company Affiliation (if any):	TANGLEWOOD CONST. CO., INC.	
Address:	305 BUTTERNUT LANE, MUNCY, PA 17756	
Telephone:	570-546-3498	
Email:	JLMUFFLY@GMAIL.COM	
ICC Code:	IRC 2012 EDITION	
ICC Code Change Number:	ALL	
Code Section(s):	ALL	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

PLEASE SEE ATTACHED LETTER.

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
Bureau of Occupational & Industrial Safety
Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

RAC Use Only		
Submission Method:	Public Hearing: E-Mail: MAIL	Date Received: 12-1-11

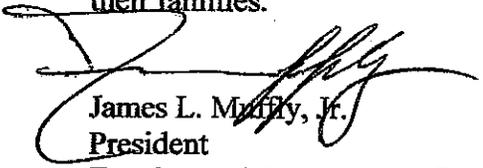
November 28, 2011

RAC Committee
Uniform Construction Code
Harrisburg, PA 17121

Dear Sirs:

With 30 years experience in the Homebuilding industry, we have had only two periods of time where we were slow or actually ran out of work. The first was in 1982-1983. The second began in 2009 and has lasted through this year. The adoption of the 2012 code, with all of the costs it adds to the price of a project, will make it even harder to have people commit to new construction projects. The country is already facing massive debt. People are unsure of their jobs from week to week. The lending institutions are ultra conservative in their loan approvals. Now is not the time to add any expense to the construction industry or the consumers in general.

In our local area of North Central Pennsylvania we should be seeing a boom in the housing industry due to the natural gas exploration. While we do have many commercial expansions, it has not made it to the housing industry. People are too afraid to commit to spending money. They are unsure of the direction that the country is heading. The adoption of any code which will increase the cost of construction will result in further slow downs in the industry and thus the local economy. I am in the position of having to lay off 5 employees for the first time in our company's 52 year history. We have never in 52 years, laid off anybody. I hope it does not come to that, but it may have to. I urge you not to adopt any new regulations that will increase the cost of construction or the cost of doing business, both for the industries health and for the sake of the many employees like mine that have depended on companies like ours to support their families.



James L. Muffly, Jr.
President
Tanglewood Construction Co., Inc.

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	
Proposer's Name	Chris Wolfersberger
Company Affiliation (if any):	Eagle River Homes, LLC
Address:	21 S. Groffdale Rd., Leola, PA 17540
Telephone:	717-656-2381
Email:	cwolfersberger@eagleriverhomes.net
ICC Code:	2012 International Residential Code
ICC Code Change Number :	
Code Section(s):	In its entirety
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change <input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare <input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts <input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

During the economic times in which we are in, I do not believe we need to increase the cost of new residential construction. When the economy was thriving new housing starts were one of the positive drivers. We need to do everything we can to turn our economy around. Thank you

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-1-11

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12/2/11	
Proposer's Name:	Edwin N Long	
Company Affiliation (if any):	The Long Barn Inc	
Address:	223 Mini Mail Rd. Ebansburg PA. 15931	
Telephone:	814-472-9122	
Email:	enlong@comcast.net	
ICC Code:	All codes	
ICC Code Change Number:	All changes	
Code Section(s):	All	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Please see Attached Letter.

Completed forms may be e-mailed to ra-icc@pa.gov or mailed to:
 Bureau of Occupational & Industrial Safety
 Department of Labor and Industry
 651 Boas Street, Room 1613
 Harrisburg, PA 17121

RAC Use Only	
Submission Method:	Public Hearing: <input type="checkbox"/> E-Mail: <input checked="" type="checkbox"/>
	Date Received: 12-3-11

December 2, 2011

To: Commonwealth of Pennsylvania
Uniform Construction Code
Review & Advisory Council

Dear: Council

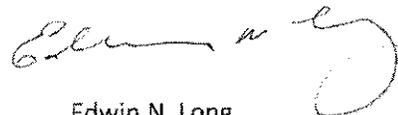
I am writing to you in reference to PA Act 45 Uniform Construction Code changes. I own part of and operate a building material supply business in the great state of Pennsylvania. In the course of my job I hear problems about the "Code" and the officials that administer it almost daily. Many potential customers of mine forgo plans to remodel, renovate or build new due to the fact that they have to go through the "Code" process and have someone else telling them how and what they can build. Many of these people including myself believe this is an infringement on our rights as Pennsylvania citizens.

As it is today the "Uniform Construction Code" is anything but uniform. Code inspectors from different agencies and even the same office interpret the code differently. This makes it very difficult for a contractor from job to job. Some of the code inspectors perceive themselves as "God Like" and whatever they say goes, no questions asked. Some are ignorant and have no knowledge or how to: about the projects they are inspecting. Anytime you give someone power over another you can be sure that, that power will be abused somewhere along the line as happens in some cases with the "Code" inspectors. Most contractors that I deal with are afraid to question a code inspector for fear that their job may be shut down or prolonged, and the appeals process takes too long and costs the contractor money and time so they just go along with whatever the inspector says whether it is right or wrong.

I believe the PA Act 45 should be repealed and the financial institutions or insurance companies can dictate to their clients how they want projects to be built. If they choose the ICC, then fine at least let the private sector take care of itself and leave government out of it. Also as a citizen of Pennsylvania I believe it is my right to build on my property whatever I see fit so long as I am using my own capital and I do not affect the health or well being of others. Let's get back to common sense and let the people be free to do what they want. By repealing this act our economy would flourish. Some may argue that without a code contractors will do "shoddy" work and that buildings will fall down. How do you think we managed in the 1st 200 years without a code? When someone does do poor work other people will find out and eventually they will be weeded out, also we have a justice system in place to deal with fraud, negligence, etc. As I mentioned earlier people forgo their projects or find some way to get around the code process many times by hiring a "shoddy" contractor, one that does not care about doing things right. In turn this actually increases the amount of work being done that is not up to par. In effect having the "Code" does the exact opposite of its stated intent.

I realize that repealing PA Act 45 is probably never going to happen so I am asking you to please keep it as simple as possible. One way to do this is to leave it alone and make no changes other than to make it easier for people to do what they want. The more regulations and codes we have the less our economy is going to grow and expand. Let the private sector alone and you will see it flourish, regulate it and it will die. Repeal PA Act 45.

Thank You,



Edwin N. Long

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	12/5/11	
Proposer's Name:	Kevin Kozco	
Company Affiliation (if any):	Turnberry Custom Homes	
Address:	8 Sandy Way Reading, PA 19607	
Telephone:	(610) 795-7575	
Email:	Kevin.Kozco@Yahoo.com	
ICC Code:	Entire 2012 Code change	
ICC Code Change Number:	A11	
Code Section(s):	A11	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

The cost of Training and material involved in a code change in this economic climate makes no sense at all. In addition, any change will likely include an increase in the overall cost of construction, where we already struggle to compete with a depressed market and overwhelming foreclosures. I strongly recommend no changes and the continuation of the 2009 code, as is for another 3 years. Thank You
P.S. Thank You for giving me a voice.

Completed forms may be e-mailed to ia-uccrac@pa.gov or mailed to:
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Department of Labor and Industry
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Harrisburg, PA 17121

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Submission Method:	Public Hearing <input checked="" type="checkbox"/>	Date Received: 12-5-11
	E-Mail <input checked="" type="checkbox"/>	

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	Nov 19th, 2011		
Proposer's Name	Thomas R. Edwards		
Company Affiliation (if any):	Lake City Manufactured Housing, Inc.		
Address:	10068 Keystone Drive; Lake City, PA 16423		
Telephone:	1-814-774-2658 Ext 226		
Email:	tedwards@lakecityhomes.com		
ICC Code:	Do not adopt the 2012 I codes		
ICC Code Change Number :			
Code Section(s):			
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Do not adopt the 2012 I codes. It is irresponsible to change for change sake and not out of necessity. There is no reason to adopt a new code, when we still haven't fully embraced the old one yet (see House Bill 377), not to mention the codes are increasing the cost of our homes rapidly. This, combined with a bad economy and an increase raw items such as wood and oil based products like shingles, siding etc...we are asking for the housing industry to falter even more. Let's put a freeze on new codes, Let the housing industry stabilize, keep the status quo which let's us build a safe and energy efficient home.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-5-11

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Commonwealth of Pennsylvania
Uniform Construction Code
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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12/05/11	
Proposer's Name	Ruth Croyle	
Company Affiliation (if any):	East End Lumber Company	
Address:	544 East Third St. Williamsport, PA 17701	
Telephone:	(570) 323-9437	
Email:	rcroyle@chilitech.net	
ICC Code:	All 2012 code changes	
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

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Submission Method:	Public Hearing:	Date Received: 12-6-11
	E-Mail: MAIL	

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**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	12-5-11	
Proposer's Name:	Bob Olchovskis	
Company Affiliation (if any):	Olchovskis Construction	
Address:	175 Robin Hill Road Indiana PA 15701	
Telephone:	724 464 8694	
Email:		
ICC Code:		
ICC Code Change Number :		
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input type="checkbox"/> Economic and Financial Impacts	<input checked="" type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Too many regulations, Too costly for consumers,
Changes happening too rapidly

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Harrisburg, PA 17121

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Submission Method:	Public Hearing: E-Mail: MAIL	Date Received: 12-7-11

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12/8/2012	
Proposer's Name	Jared Erb	
Company Affiliation (if any):	Custom Home Group, Inc.	
Address:	1302 Lancaster Pike Quarryville PA 17566	
Telephone:	717-284-4090	
Email:	jared@customhomegroup.com	
ICC Code:	All 2012 Codes	
ICC Code Change Number :	All 2012 Code Changes	
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

I would strongly recommend not adopting any code changes for 2012. I reviewed the potential code changes for 2012 and I personally do not see any alarming public safety issues that make the present 2009 code a liability or hazard to the general public. Most of the changes will have a financial impact to the home buyer. Some of the changes have a minimum financial impact, but those small amounts do add up and can put new home ownership out of reach for many buyers.

My second reason would be the growing financial impact to the state government and local municipalities. I think many of are are aware of the finance issues the city of Harrisburg is facing and many other localized government have an increasing fiscal debt. If we can limit seemingly unnecessary changes like these, we can save time and expense on the government level. This could help keep taxes lower for the citizens and assist the American people in embracing home ownership. I

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 Department of Labor and Industry
 651 Boas Street, Room 1613
 Harrisburg, PA 17121

	RAC Use Only	
Submission Method:	Public Hearing: <input type="checkbox"/> E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-8-11

I would strongly recommend not adopting any code changes for 2012. I reviewed the potential code changes for 2012 and I personally do not see any alarming public safety issues that make the present 2009 code a liability or hazard to the general public. Most of the changes will have a financial impact to the home buyer. Some of the changes have a minimum financial impact, but those small amounts do add up and can put new home ownership out of reach for many buyers.

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Finally, because Pennsylvania just recently finished working through the sprinkler system issue, the designer/architects, code inspectors, local municipalities and the Trades are finally understanding and implementing the codes for 2009. It is challenging for the building community to keep up with the frequency of the changes.

Thank you - Jared Erb

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12/8/2012		
Proposer's Name	Jared Erb		
Company Affiliation (if any):	Custom Home Group, Inc.		
Address:	1302 Lancaster Pike Quarryville PA 17566		
Telephone:	717-284-4090		
Email:	jared@customhomegroup.com		
ICC Code:	IBC		
ICC Code Change Number :	RB – 122 pt. 2		
Code Section(s):	B 1405.13.2		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
(Provide Details Below)	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

I would strongly urge the code committee to not adopt the change of requiring window sill height minimums from 24" to 36" above the finished floor when a window is located 72" above finished grade. As a design/build company we have a passion and respect for the historic architecture here in Pennsylvania and across the east coast. Many of our clients do as well and like to replicate the historic homes in our area. If second floor windows on the front of homes would need to be 36" off of the floor, it would be impossible to reproduce the charm that historic homes such as the Rock Ford Plantation, Robert Fulton House, Sehner-Ellicott-von Hess House, etc. For the second floor windows to be egress (5.7 SF) and 36" off of the floor they will look disproportionate and have a negative impact on the exterior aesthetics of the new homes being built.

Further more, those second floor windows would also need to be casement windows to meet the egress size requirement instead of single-hung or double-hung. A casement

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Submission Method:	Public Hearing: <input checked="" type="checkbox"/> E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-8-11

I would strongly urge the code committee to not adopt the change of requiring window sill height minimums from 24" to 36" above the finished floor when a window is located 72" above finished grade. As a design/build company we have a passion and respect for the historic architecture here in Pennsylvania and across the east coast. Many of our clients do as well and like to replicate the historic homes in our area. If second floor windows on the front of homes would need to be 36" off of the floor, it would be impossible to reproduce the charm that historic homes such as the Rock Ford Plantation, Robert Fulton House, Sehner-Ellicott-von Hess House, etc. For the second floor windows to be egress (5.7 SF) and 36" off of the floor they will look disproportionate and have a negative impact on the exterior aesthetics of the new homes being built.

Further more, those second floor windows would also need to be casement windows to meet the egress size requirement instead of single-hung or double-hung. A casement style window is almost double the cost of a single-hung window. That would also have a negative impact on the economy.

In conclusion, I have not personally seen evidence of an overwhelming number of accidents because of a 24" window sill height. Is there a case study that shows that this is a growing safety concern? If so, please let me know where I can find that study(s) because I would like to learn of their results.

Thank you - Jared Erb

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	Dec 10 2011	
Proposer's Name	Donna Umstead	
Company Affiliation (if any):	U & U Modular Homes	
Address:	1689 Highway 405, Hughesville, PA 17737	
Telephone:	570-584-4400	
Email:	RichardUmstead@yahoo.com	
ICC Code:	PA-003367 ALL 2012 I-CODES	
ICC Code Change Number :	ALL CODE CHANGES (VERBAL CONFIRMATION)	
Code Section(s):		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

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Submission Method:	Public Hearing: E-Mail: MAIL	Date Received: 12-13-11