

Proposed Amendment to the 2012 IECC

Since the deferment of the adoption of the 2012 codes, there has been much discussion over the reservations and concerns that Lawrence home builders have with the new code. While the Lawrence Home Builders Association (LHBA) agrees that adoption of the new code should proceed and that improving the energy efficiency of new homes is viewed favorably, there are two basic concerns about the new 2012 International Energy Code.

Return on Investment

Several builders have performed cost estimates and have expressed concerns over the cost of prescriptive compliance and actual energy savings. There is substantial disagreement on ROI which can vary by home type and the builder's standard level of construction. It appears the most expensive component of the new code (responsible for at least 50% of the cost) is the prescriptive requirement for increased exterior wall insulation.

Mandatory Building Tightness

The new code mandates building tightness testing, which is new to most home builders. It also sets a maximum air leakage rate a home must have. Since the home must be nearly complete before this test can take place, many builders are concerned about the consequences of failing this test. Some are concerned that subsequently passing the test may require some deconstruction of a nearly completed structure.

After much discussion, the LHBA has come up with a compromise that alleviates these concerns, helps to inform homebuyers and gives builders a means to measure the efficiency of their products. It also frees them to find their own paths to efficiency.

The LHBA proposes the following:

HERS Alternative

A home must comply with the *mandatory* provisions of the 2009 IECC and obtain a Home Energy Rating System (HERS) index¹ of 85 or less from a certified, independent, third party inspector². One calendar year from the date of inception the HERS index will decrease to 80 or less and in two years it will decrease to 75 or less. The HERS index shall be displayed on the home's electrical panel.

¹ The HERS index as defined by the Residential Energy Services Network (RESNET) Comprehensive HERS Rating (CHER).

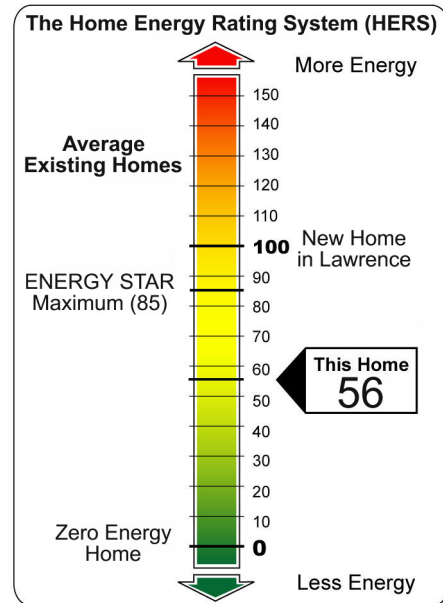
² HERS inspectors must be certified by a RESNET accredited rating provider.

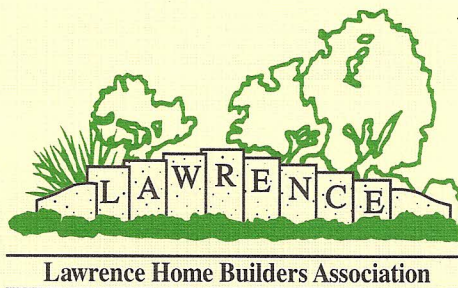
The method of compliance must be stated on the permit application along with the name, license # and contact information of the *approved* third party inspector who is independent from the installer of the insulation.

The HERS index is a nationally recognized, well defined standard that is analogous to MPG for automobiles. Adding in the mandatory provisions of the 2009 IECC makes this amendment work well and includes the current duct testing and fireplace requirements.

The HERS inspector should be included on the permit application in the same way as the plumber, electrician, etc. No additional energy information should be required with the application. This HERS inspector must perform an insulation inspection, blower door test, duct test and computer analysis to determine the HERS index. As with the 2009 code and the 2012 code, the duct test is not necessary for homes that have all their ducts within the envelope, though performing the test may yield a better number in some cases.

Note that this is an additional option to those that already exist under the 2012 IECC as amended.





December 18, 2012

Lawrence City Commission
Mayor Bob Schumm
6 E 6th Street, P.O. Box 708
Lawrence, KS 66046

Dear Commissioners,

The Lawrence Home Builders Association supports the adoption of the 2012 International Codes. The Building Code Board of Appeals has suggested phased approaches to the most onerous new codes: higher insulation standards and new air tightness requirements. This proposed phased approach will allow more time for builders and their subcontractors to adjust their strategies to comply in the most cost-effective way.

The new codes will promote greater energy efficiency and comfort. Building our homes tighter in concert with ventilation and more insulation will result in heating and cooling savings for the homeowner. But, while greater energy efficiency can serve as a selling point to potential buyers, it should also be recognized that it comes with upfront costs. Increasing the cost of new homes is a concern, particularly for those seeking affordable housing. Another concern is that comparables used by appraisers won't take into account the efficiency aspects as a factor in determining value. Therefore, existing homes built with lesser energy requirements under previous codes will appear to be a better buy unless home buyers are educated on the long-term benefits of owning a more energy efficient home.

Lawrence currently has the highest building code standards in the region. And, while the LHBA supports having strong building codes ensuring health, safety and welfare, we also have the expectation that the new energy requirements have a clear demonstration of fiscal benefit back to home buyers to justify the cost increase. We will work to educate and train our members on best practices to meet the new code requirements and to minimize the impact to affordable housing.

Sincerely,

Bobbie Flory
Executive Director

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