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Building Inspection
Policy & Procedure
No. 115

P&P 115

Adopted: February 16, 2012
Last Reviewed: April 13, 2018

ENERGY EFFICIENCY REQUIREMENTS – Change of Use ORSC Section N1101.2

Issue:

Section N1101.2.3 of the Oregon Residential Specialty Code (ORSC) requires that a change in use, without any changes to the components regulated by chapter 11 of the ORSC is required to comply with Table N1101.2 to the greatest extent practical. The purpose of this policy is to provide guidance on what is considered practical.

Background:

When converting an existing structure from either non-conditioned spaced to conditioned space, or from a non-habitable space to habitable space the existing structure may present challenges to complying with Table N1101.2. The code recognizes that there will be instances where it is not practical to comply with the requirements of Table N1101.2. The intent of this policy is to provide guidelines that will ensure consistency when determining what is considered practical. As part of the process for determining the intent of the code requirements related to Table N1101.2, staff has sought out guidance from the state, as well as other local jurisdictions.

Policy:

1. A garage door (including insulated garage door assemblies) will not meet the requirements for the exterior envelope of the conditioned space.
2. Thermal performance calculations may be submitted in lieu of using Table 1101.2.
3. Except as noted below the existing building shall comply with Table N1101.2:
 - a. For an existing slab on grade floor, slab edge perimeter insulation is not required to be installed.
 - b. Existing windows that do not meet the current energy efficiency requirements are not required to be replaced, but any new windows installed will be required to meet the energy efficiency requirements of the ORSC.
 - c. It is not practical to require the replacement of insulation in walls that are already insulated and covered by drywall and/or paneling. It is practical to have insulation blown into uninsulated wall cavities.