

**WEEKLY INFORMATION PACKET
MEMORANDUM**

To: Mayor Appelbaum and City Council

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Date: October 15, 2009

Subject: Information Item: Update on potential code changes, involving energy efficiency requirements for existing rental housing and other Green Building initiatives.

EXECUTIVE SUMMARY:

The implementation of the Climate Action Plan (CAP) involves activities across several city departments and operations and includes various strategies to reduce greenhouse gas (GHG) emissions. The purpose of this memo is to provide an update on potential changes to the housing code and rental licensing code, including options for energy efficiency requirements, to address CAP objectives. Updates on related Green Building initiatives are also provided.

At a Nov. 18, 2008 CAP study session, council identified strategies needed to reduce GHG emissions to meet CAP objectives. One of the primary strategies for reaching this goal is reducing energy use in buildings. From 2007 through the first quarter of 2009, several energy efficiency measures were implemented that exceed 2006 International Energy Conservation Code (IECC) minimum standards for residential and commercial buildings in new construction, remodels and additions. Commercial construction must document energy efficiency 30 percent better than the 2006 IECC. Residential construction must be 30 to 75 percent more efficient than the 2006 IECC based on the size of the structure with larger houses having the higher efficiency requirements.

Addressing energy efficiency in existing rental housing and existing commercial buildings has been the focus of the 2009 work plan. Changes to the rental housing and inspection program, including options for energy efficiency requirements, are being developed and will be reviewed by several city boards before being scheduled for City Council consideration during the first quarter of 2010. The development of a Commercial Energy Conservation Ordinance (CECO) is also being analyzed and will be scheduled for council consideration during the fourth quarter of 2010.

The program for existing rental housing is scheduled to move forward first since an infrastructure to administer that process is already available through the city's rental licensing program. As part of the CECO project, potential administrative trigger points need to be identified. Modifications may be needed to the city's business licensing process or a registration program may need to be developed to provide a mechanism for its administration.

A variety of Xcel Energy rebates for efficiency improvements continue to be available to residential and commercial property owners and are promoted through the city's CAP programs. In addition, other investment opportunities are expected to be available in the near future for commercial properties. The opportunities will be promoted in parallel with the CECO analysis.

In December 2009, world leaders will meet in Copenhagen, Denmark to draft a new global agreement and carbon reduction goal that will most certainly raise expectations beyond those established during 1997 in Kyoto. **Attachment A** outlines a proposed path of code changes intended to meet CAP objectives, including steps for code adoption beyond 2012 that council may want to consider in order to move towards carbon neutrality.

COMMUNITY SUSTAINABILITY ASSESSMENTS AND IMPACTS:

Economic: The adoption and consistent application of building codes and standards support all segments of the community and a sustainable economy. Proposed code changes are evaluated to demonstrate how the economic impact and investment is offset by increasing energy efficiency and corresponding reductions in ongoing operational costs.

Environmental: Building codes play an important role in reducing energy use and carbon emissions in the city's new and existing building stock. Reducing energy use in existing buildings, especially rental housing and commercial space, may not be achieved sufficiently through voluntary measures.

Social: Building codes address the social impacts of the Boulder community by supporting the management of potential impacts to life and property. Additionally, energy efficiency improvements benefit the community by reducing carbon emissions. Homeowners and/or tenants benefit with lower, more predictable utility bills as energy prices continue to increase.

FISCAL IMPACT:

Periodic code update and maintenance is part of the normal work plan involving the use of staff resources. Costs for the implementation of these code changes, including training for customers and staff, are included within the city's operating budget. Potential additional resources to support proposed changes to the rental licensing program will be evaluated.

BACKGROUND:

The City of Boulder periodically updates its construction codes. This effort is done in a coordinated and integrated manner in order to maintain a practical balance between safety and costs to protect life and property while advancing green building objectives pertaining to sustainable development. Column 2 of Attachment A outlines residential and commercial energy efficiency programs that were implemented during 2007, 2008 and the first quarter of 2009.

Throughout 2009, staff has been working on residential and commercial energy efficiency programs for existing rental housing and existing commercial buildings where no permit activity (already requiring energy efficiency measures) is occurring. The program for existing rental housing is scheduled to move forward first since an infrastructure to administer that process is already available through the city's rental licensing program. As part of the CECO project, potential administrative trigger points need to be identified. Modifications may be needed to the city's business licensing process or a registration program may need to be developed to provide a mechanism for its administration.

On July 22, 2009, staff began holding meetings with a community working group that included representatives from the Boulder Area Rental Housing Association, University of Colorado Off Campus Student Services, Boulder Housing Partners, apartment owners and licensed rental housing inspectors to discuss ideas and formulate update proposals to the housing and rental licensing codes as well as options for energy efficiency requirements to existing rental housing units.

The scope of work being addressed by the working group includes:

- Consideration, as an alternative to amending the existing housing code, of the potential adoption of the International Property Maintenance Code (IPMC) and/or the International Existing Building Code (IEBC),
- Consideration of energy efficiency requirements, measures and options that could be added to the housing code and/or national standards to address CAP objectives, and
- Review of proposed revisions to the rental licensing provisions of the code to further streamline and clarify its administration.

A summary of working group progress is provided below in the analysis section of this memorandum.

ANALYSIS:

Housing Code Update

The working group has been considering, as an alternative to amending the existing housing code, the potential adoption of the 2009 IEBC and 2009 IPMC. Potential energy efficiency requirements for rental housing are expected to be incorporated into the recommendations.

The working group has determined that the 2009 IEBC should not be considered as an alternative to the existing housing code. The 2009 IEBC is intended to aid in the design of major remodeling and renovation of large multiple-residence or commercial building projects.

The working group continues to evaluate the 2009 IPMC and has provided significant feedback that will aid staff in updating the code, by either incorporating the 2009 IPMC into the existing housing code or replacing it. It has also been suggested that an informational booklet be created to aid owners, tenants and the public in understanding and utilizing the housing code and/or IPMC.

The rental licenses section of the code, as well as the rental inspection checklists, will be updated as necessary to integrate with the revised housing code or IPMC. Additionally, Title 6, B.R.C. Health, Safety and Sanitation will be reviewed for continuity with the proposed changes.

Rental License Code

Updates to the rental license section of the code have been reviewed by the working group and will be recommended to council for consideration. The updates are necessary to further streamline and clarify program administration. Rental inspection checklists, which indicate the housing code requirements that must be met to receive a rental license, will be further refined in the next few weeks.

Energy Efficiency Requirements

The following concepts have been reviewed and discussed by the working group and will be incorporated into a proposal for public outreach. Additional comments from the working group are summarized in **Attachment B**.

Requirements for Energy Efficiency Improvements

Staff is proposing energy efficiency improvements to attain a targeted energy efficiency performance level that can be determined by either prescriptive or performance measures. A prescriptive list may be proposed as a menu so that property owners are able to choose measures that correlate to the age and type of construction of their particular building. The performance option would use the Residential Energy Services Network (RESNET) Home Energy Rating System (HERS) to determine the level of energy efficiency to be attained.

Feasibility Threshold

The maximum investment in energy efficiency improvements is proposed to be limited by a feasibility threshold. This is a concept that limits how much must be invested in a property to meet energy efficiency targets. Depending on how the program is structured, the feasibility threshold could apply to the investment necessary for energy efficiency improvements per rental license period until the prescribed efficiency goals are attained, or the program could feature a single investment for energy efficiency that would be limited to the amount specified regardless of whether the efficiency targets are attained. The feasibility threshold amount has not been determined; however, different thresholds for multi-family and single-family detached units seem to be justified by the different GHG profiles of the two housing types. Properties that invoke the feasibility threshold and do not achieve the energy efficiency targets are proposed to be eligible for a rental license, but will not be listed in the proposed rental energy efficiency rating system (described below).

Carbon Offset Allowance

In order to meet CAP goals of measurable GHG emission reductions and to allow property owners time to plan for the energy efficiency improvements, an allowance for a carbon offset or renewable energy credit (REC) may be proposed. The carbon offset allowance would provide the property owner with time (a four-year renewal cycle) to plan and raise the capital to make the necessary energy efficiency improvements. The credit or offset amounts have

not been established and, as described above, different amounts for multi-family and single-family detached may be justified by the different GHG profiles of the two different types of properties. The city could serve as an aggregator for the Colorado Carbon Fund (CCF), which would allow 20 percent of the offsets purchased to be reinvested in the Boulder community, potentially to rental housing energy efficiency projects.

Rental Energy Efficiency Rating System

The working group proposed creating an energy efficiency rating system for rental housing. Separate lists would be developed for properties meeting prescriptive or performance energy efficiency compliance and a marketing campaign/recognition program could be developed for properties that have exceeded energy efficiency code requirements. A rating system for rental housing could create market demand for energy efficient rental properties. The rating system would inform renters which properties are the most energy efficient. Developing a campaign and recognition program to promote the rating system would encourage renters to ask for the efficiency rating of the property. If renters choose properties based on the rating of the property, landlords would have an incentive to upgrade their properties to remain competitive in the market.

The prescriptive section would list the features of prescriptive compliance. The performance list would use the HERS rating. Renters would benefit from the ability to compare the total cost of a rental with various energy efficiency ratings. While the working group agreed to the benefits of establishing an energy efficiency rating system, details associated with the design of the system and its maintenance continue to be discussed.

Xcel Energy Rebates

A variety of Xcel Energy rebates for efficiency improvements are available to residential and commercial property owners and are promoted through the city's CAP programs. The current programs will continue through the end of 2010 with new or additional programs starting in 2011. Examples of commercial programs are energy analysis assistance, lighting retrofits and HVAC system upgrades. Residential programs include energy audits, insulation rebates and evaporative coolers. On several occasions, council mentioned the importance of maintaining access to Xcel Energy rebates for property owners required to meet efficiency codes. Xcel has stated that prescriptive rebates (for specific equipment such as furnace upgrades or insulation) will be available to residential rental properties. Properties can qualify for performance program rebates when improvements exceed the local code. Staff expects a similar approach for commercial rebate programs, but is awaiting confirmation from Xcel.

Commercial Energy Conservation Ordinance (CECO)

Staff issued a request for proposals (RFP) in August 2009 seeking a third party analysis of the options for development and potential impacts of a CECO. Respondents were requested to provide information regarding their experience in working with building and energy efficiency codes, analyzing GHG impacts of municipal programs and an estimated timeline for completing the scope of work. Five companies provided proposals to the city, and staff will interview three finalists in October. Staff will include the CAP Commercial Technical Team in review of the

scope of work and seek feedback on the timing of the CECO as it fits with the overall strategy to achieve GHG reductions in the commercial building sector.

In addition to Xcel Energy rebates, other investment opportunities will be available in the near future (possibly as soon as this winter) for commercial properties. The opportunities will be promoted as soon as they are available in parallel with the CECO analysis and in advance of ordinance adoption. These opportunities include financing from the ClimateSmart Loan Program, financing from a Governor's Energy Office (GEO) revolving loan fund and a small amount of direct rebates from the city's allocation of American Reinvestment and Recovery Act funding (approximately \$75,000, with a potential match of \$75,000 from GEO). Staff will provide updates to council on the CECO process, Xcel rebates and other investment opportunities as part of the quarterly CAP reporting and concurrent with this code update process.

Beyond 2012

Boulder's current CAP is focused on achieving the 2012 goal adopted by council and informed by the Kyoto protocol goal; however, that goal will not be sufficient in addressing the challenge posed by greenhouse gas emissions and climate change. In December 2009, world leaders will meet in Copenhagen, Denmark to draft a new global agreement and carbon reduction goal that will most certainly raise expectations beyond those established in Kyoto. **Attachment A** includes steps for code adoption beyond 2012 that council may want to consider in order to achieve goals for the post-2012 period as we move towards carbon neutrality.

NEXT STEPS:

Opportunities for further public feedback on proposed changes to the rental housing and inspection program will be offered in November. Staff recommendations will be forwarded to the Environmental Advisory Board and Landmarks Board in December 2009. Planning Board review is scheduled for January 2010. This item will be scheduled for consideration by City Council during the first quarter of 2010.

ATTACHMENTS:

Attachment A: Proposed Commercial and Residential Green Building Adoption Matrix and Narrative

Attachment B: Community Working Group (Energy Efficiency Subcommittee) Comments

ATTACHMENT A

Proposed Commercial and Residential Green Building Adoption matrix

Purpose: The Commercial and Residential Green Building Adoption Matrix (attached) charts energy efficiency and conservation measures related to residential and commercial structures for the recent past and in the future. There are six basic International Building Code designated construction categories detailed in Column #1 where green building proposals are being considered:

1. International Residential Code (IRC) New Construction (Duplexes, Townhouses and Single Family Dwellings)
2. IRC Remodels and Additions
3. Existing IRC Buildings (No Permit Activity)
4. International Building Code (IBC) New Construction (Commercial and Multi-Family Residential)
5. IBC Remodels and Additions
6. Existing IBC Commercial and Multi-family Residential (No Permit Activity)

2007/2008 Green Building Changes Column #2

As depicted in the matrix, the city implemented major changes in 2008 to items #1 & #2 for IRC buildings with the adoption of a modified Green Points program and a multi-tiered residential Home Energy Rating System (HERS) above code program. Residential construction must be 30 to 75 percent more efficient than the 2006 International Energy Conservation Code (IECC) based on the size of the structure with larger houses having the higher efficiency requirements.

The 2006 IECC simplified and modified the methods for designing commercial buildings but did not substantively enhance the overall energy efficiency compared to the previous code. The 2006 IECC changes were implemented in early 2009 for items #4 & #5 for new and remodeled commercial structures within the City of Boulder. The changes incorporated by the City now require commercial structures to be designed and constructed to be a minimum of 30 percent more energy efficient than the 2006 IECC. On commercial construction projects over 20,000 square feet the 30 percent energy efficiency is to be shown through an approved modeling program. The 30 percent above code program would also be demonstrated according to the criteria detailed in Chapter 4 and 5 of the 2006 IECC which include:

1. ASHRAE/IESNA Standard 90.1, Energy Standard for Buildings Except for Low-Rise Residential Buildings.
2. United States Department of Energy, building energy requirements calculated through the ComCheck computerized design program, most current version, www.doe.gov.
3. IBC multiple-residential structures are to be designed to meet the February, 2008 requirements adopted for “Green Building” and “Green Points” as detailed in BRC 10-7.5.

Note: City approved alternative prescriptive design criteria for structures less than 20,000 square feet that are 30 percent above code are available through ASHRAE/IESNA through www.doe.gov website (Advanced Energy Guide for Schools, Small Retail, Small Office and Small Warehouse/Storage Buildings).

An alternative proposal presented to the council from Jim Logan and Collin Tomb of Jim Logan Architects suggested adopting ASHRAE 189.1 as part of the City of Boulder commercial green building code. This standard has come out of a public comment period, but will not be ready for adoption until late 2010. Staff will include the review of this document in the 2009 IECC review and adoption process. When this document is completed by ASHRAE it could be used as an acceptable alternate prescriptive design method.

Proposed 2009 Green Building Changes
Column # 3

For residential green building proposals related to items #1, #2, #4 & #5 staff will be reviewing the ICC 2008 National Green Building Standard for possible use as a replacement for the current Green Points and Green Building Program in the second quarter of 2010.

For existing residential rental structures related to item #3 staff will be working throughout the year toward the adoption of an energy efficiency program that will apply to upcoming rental license renewal properties over the next few years that will support CAP goals in GHG reductions in the residential sector. The target is 1 to 4 metric tons of carbon reductions per residential rental unit. The 2009 International Property Maintenance Code is being considered as a platform for these proposed residential rental requirements.

For commercial buildings in items #4 and #5 the Boulder County Commercial Consortium program will be reviewed for possible inclusion in the upcoming 2009 IECC code adoptions. To date, the recommendations from the Boulder Codes Consortium can be summarized as being 30 percent better energy efficiency than the baseline code and also include sustainable building requirements much like LEED requirements that have been written in code language to facilitate local adoption.

For existing commercial structures related to item #6 staff will be working throughout the year toward the adoption of an energy efficiency program that will support CAP goals in GHG reductions in the commercial sector. The adoption of this program is targeted for the fourth quarter of 2010. The 2009 International Property Maintenance Code is being considered as a platform for these proposed requirements.

Proposed 2010 Green Building Changes
Column #4

The International Code Council has now published the 2009 IECC. Staff will review this 2009 IECC document, our currently adopted codes and other nationally developed green building

standards and provide recommendations to the council for a comprehensive Green Building Code adoption that meets the current needs of the city of Boulder. Staff recommendations to council for upgrading to a modified 2009 IECC will begin in the second quarter of 2010 with an adoption date in late 2010. The residential 30 to 75 percent energy efficiency levels above code and the commercial 30 percent above code energy efficiency requirements are proposed to be maintained when the 2009 codes are adopted.

For green building proposals related to item #1, # 2, #4 & #5 new and remodeled IBC/IRC Residential Buildings, staff will review the current city of Boulder Green Points (sustainable components) program and the 2008 ICC National Green Building Standard to formulate recommendations to the council for an updated program. This process will begin in the second quarter of 2010.

During the fourth quarter of 2010 staff will be working toward the adoption of an energy efficiency program for existing commercial buildings as detailed in item #6.

Proposed 2011 Green building Changes
Column #5

Staff will be preparing to adopt the 2012 IECC for items #1 - #6 during the fourth quarter. A review of the CAP goals for enhancements to the program and adoption into the 2012 IECC for items #1 - #6 will also be part of the process. Energy efficiency requirements for existing residential and commercial buildings will be considered for units being sold or going through some type of city land use review in items #3 & #6. Renewable and sustainable components for commercial building will be considered for item #4 & #5.

Proposed 2012 Green Building Changes
Column #6

The 2012 IECC will become effective for items #1 - #6 during the 1st quarter.

Proposed 2014 Green Building Changes
Column #7

Staff will be preparing to adopt the 2015 IECC for items #1 - #6 and will also be reviewing possible community renewable energy resources for wind, solar and other renewable resources throughout the year.

Proposed 2015 Building Changes
Column #8

The 2015 IECC will become effective for items #1 - #6 during the 1st quarter.

Proposed 2016 – 2030 Changes
Column #9

Code adoptions to meet energy efficiency goals will be considered and detailed in the future for this time period.

ATTACHMENT B

Below is a list of other comments from the energy efficiency subcommittee:

- There needs to be a level of exemption for landlords on properties that have already made improvements.
- Rental housing market fell apart this year, not a good time to initiate this ordinance. (although there is conflicting opinion about this and some subcommittee members suggested more objective analysis should be provided before final decisions are made based on the views of certain stakeholders)
- Rental housing industry has already had to fulfill other recent expensive legal mandates that required major expenditures.
- Increase allowable occupancy as an incentive for efficiency was proposed; staff is evaluating this and could include it as a comment in the updates to Council.
- Concerns about mandating compact fluorescent light bulbs due to liability issues.
- Incentives were seen as much more favorable over financing options (unless the interest rate was 0%). Climate Smart Loan Program is not a viable option to fund these improvements.
- Rather than offer financing, allow much more time to make improvements (10-20 years) so owners can spread the investment out over time.
- Committee explained how these investments would negatively affect income property values. Although, some subcommittee members stated that property values or rents could increase from energy efficiency improvements and that rents could be raised to recover investments.
- Perhaps include an option where the landlord is the “behavior” trainer to the tenant and could get points for this on the prescriptive list.
- Changing the rental cycle to five years would allow extra money to be spent on the property’s energy improvements.
- Require insulation of pipes especially in boiler rooms, a lot of heat loss occurs here.
- Requiring energy efficiency improvements in rental properties will drive people out of the Boulder market.
- At council budget hearings, resident surveys showed carbon reduction as their lowest priority use for city money.
- Although the phase-in carbon offset approach sounds appealing the reality is there will not be a lot of money to allocate back to the community given the numbers of properties that will be making improvements every year. There will be LOTS of demand for not much money, and therefore maybe a lot of upset landlords. Example: if there are 60,000 tons bought by 2012, there will be \$240,000 available to about 15,000 units requiring compliance. This comes out to about \$16/unit.
- Having the renewable credit purchase option helps with the ability to come into compliance.

- As codes are updated, triggers should be in place for things like siding: require a permit to re-side a building and require certain levels of insulation be added.
- Changes made to physical property may or may not decrease the actual energy use. (Ex: efficiency property, tenant leaves windows open in winter). However, offset purchases guarantee carbon reduction benefits and more money will come back to the city for improvements.
- Council might also be interested in knowing the number of jobs and business taxes that could come from this relatively huge initiative. Likewise, a percentage of the money renters don't spend on Xcel bills will get spent locally.

Commercial and Residential Green Building Adoption Matrix

Building Construction Type	2007/2008	2009	2010	2011	2012	2014	2015	2016 - 2030
1. New IRC Residential - Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9
Duplex, Townhouse, SFD	2006 IECC Compliance - 10/30/07* HERS Rating/Green Points - 1/22/08* Efficiency 30-75% > 2006 IECC - 1/22/08*	Review NAHB/ICC - Green Building Standard Review Green Bldg./Green Points Program	2009 IECC Adoption - 2nd quarter Adopt/Implement - NAHB/ICC - Green Building Standard	2012 IECC Adoption - 4th quarter Review program for CAP enhancements	2012 IECC Effective 1st quarter	Adopt 2015 IECC Renewables - (wind, solar, etc.)	2015 IECC Effective 1st quarter	Future code adoption to meet new goals
2. IRC Residential - Remodels/Additions								
Duplex, Townhouse, SFD	2006 IECC compliance - 10/30/07* HERS Rating/Green Points - 1/22/08* Threshold for new construction - 11/25/08* Efficiency 30-75% > 2006 IECC - 1/22/08*	Review NAHB/ICC - Green Building Standard Review Green Bldg./Green Points Program	2009 IECC Adoption - 2nd quarter Adopt/Implement - NAHB/ICC - Green Building Standard	2012 IECC Adoption - 4th quarter Review program for CAP enhancements	2012 IECC Effective 1st quarter	Adopt 2015 IECC Renewables - (wind, solar, etc.)	2015 IECC Effective 1st quarter	Future code adoption to meet new goals
3. Existing IRC Residential - With no permit activity								
Duplex, Townhouse, SFD		2009 IPMC Review - 4th quarter Residential Rental Property Energy Efficiency Program -	2009 IECC Adoption - 2nd quarter 2009 IPMC Adoption - 1st quarter Residential Rental Energy Program Effective - 1st quarter	2012 IECC Adoption - 4th quarter Review program for CAP enhancements Point of sale/site plan review	2012 IECC Effective 1st quarter	Adopt 2015 IECC Renewables - (wind, solar, etc.)	2015 IECC Effective 1st quarter	Future code adoption to meet new goals
4. New IBC Commercial/Residential								
Commercial, Residential 3-plex & larger	2006 IECC compliance - 10/30/07* Efficiency 30% > 2006 IECC (Comm.) - 10/21/08* Model buildings > 20K sq. ft. (Comm.) 10/21/08* HERS Rating/Green Points/30-75% > IECC (Res.)	Review NAHB/ICC - Green Building Standard Review Boulder County Commercial Consortium Program Review Green Bldg./Green Points Program	2009 IECC Adoption - 2nd quarter Include Consortium Amendments Adopt/Implement - NAHB/ICC - Green Building Standard	2012 IECC Adoption - 4th quarter Review program for CAP enhancements Renewable components (Commercial) Sustainable components (Commercial)	2012 IECC Effective 1st quarter	Adopt 2015 IECC Renewables - (wind, solar, etc.) Adopt 2015 IGCC	2015 IECC Effective 2015 IGCC Effective	Future code adoption to meet new goals
5. IBC Commercial/Residential - Remodels/Additions								
Commercial, Residential 3-plex & larger	2006 IECC compliance - 10/30/07* Efficiency 30% > 2006 IECC (Comm.) - 10/21/08* Model buildings > 20K sq. ft. (Comm.) 10/21/08* HERS Rating/Green Points/30-75% > IECC (Res.)	Review NAHB/ICC - Green Building Standard Review Boulder County Commercial Consortium Program	2009 IECC Adoption - 2nd quarter Include Consortium Amendments Adopt/Implement - NAHB/ICC - Green Building Standard	2012 IECC Adoption - 4th quarter Review program for CAP enhancements Renewable components (Commercial) Sustainable components (Commercial)	2012 IECC Effective 1st quarter	Adopt 2015 IECC Renewables - (wind, solar, etc.) Adopt 2015 IGCC	2015 IECC Effective 2015 IGCC Effective	Future code adoption to meet new goals
6. Existing IBC Commercial/Residential - With no permit activity								
Commercial, Residential 3-plex & larger		2009 IPMC Review - 4th quarter Review Commercial & Residential Rental Energy Efficiency Program	2009 IECC Adoption - 2nd quarter 2009 IPMC Adoption - 1st quarter Adopt Commercial Energy Conservation Ordinance - 4th quarter	2012 IECC Adoption - 4th quarter Review program for CAP enhancements Point of sale/site plan review	2012 IECC Effective 1st quarter	Adopt 2015 IECC Renewables - (wind, solar, etc.)	2015 IECC Effective 1st quarter	Future code adoption to meet new goals
	* Council Approval Date							