

The following general comments are provided by the City of Portland Bureau of Planning and Sustainability as an addendum to the Oregon Department of Consumer & Business Services Building Codes Division (BCD) Code Amendment Proposal Application for the Oregon Reach Code and BCD's identification of the draft 2012 International Green Construction Code Version 1.0 (IGCC) as the model document for this code:

- As described in Section 5(3) of Senate Bill 79, "When amending the state building code under ORS 455.030, the director shall consider whether any of the standards and methods contained in the Reach Code should be removed from the Reach Code and adopted in the state building code." Since the state building code is prescriptive, only the prescriptive compliance options in IGCC Chapters 3 and 6, or ASHRAE/USGBC/IES 189.1 should be considered for the Oregon Reach Code where these options exceed the Oregon Energy Efficiency Specialty Code.
- Since reflective roof coverings and vegetated roofs can provide an energy efficiency benefit to buildings, IGCC Sections 404.3 and 406.6 should be included in the Oregon Reach Code.
- Applicable sections of the Referenced Standards in IGCC Chapter 12 should be included directly in the Oregon Reach Code.