National Association of Home Builders

2021 Pittsburgh ICC Public Comment Hearings Voting Guide

NAHB.org/CodeDevelopment

Sept. 21 – Sept. 26, 2021

National Association of Home Builders

NAHB's Voting Recommendations for 2021 Group A Code Change Proposals

The National Association of Home Builders urges all Governmental Member Voting Representatives to support the housing industry on the following code change proposals. This voting guide will assist you in supporting only those code change proposals that are necessary and will result in the ability of the construction industry to continue building safe and affordable housing in the future.

This voting guide provides you with all the information you need to follow during the Public Comment Hearings. Code change proposals are listed in numerical order and include each public comment submitted for each proposal and a brief description for each. In the center column of each row is NAHB's recommended action for that specific proposal and a position for each public comment should they be brought forward for a vote. NAHB has also identified critical code changes (shown in bold) that will have a serious impact on the enforcement and adoptability of the Group B codes.

How to use this guide- When the moderator calls for the Proposal, look to the Center column titled "Recommended Action/Vote" to see the NAHB recommendation for each Proposal and position on the Public Comment(s). For example, NAHB would like the Standing Motion of Disapprove to be overturned for F111 and then be "Approved as Modified by Public Comment 1" or "Approved as Submitted", as indicated by the "Support (AMPC 1) or (AS)" in the middle column.

International Fire Code

Prop #	PC#	Proposal/Comment Description	Recommended Action & Vote	Reason Statement
F111		**This proposal requires that a systematic plan of correction is established when work is required under Chapter 11.**	Oppose Standing Motion (D) Support (AMPC 1) or (AS)	**This proposal addresses the lack of direction to the code official when setting a timeframe for corrections for existing buildings. The fire code official remains the ultimate decider, but it allows the building owner to give input regarding construction realities.**.
	PC 1	**Modifies the proposal by clarifying the roles of the fire official and the owner.**	Support	**The comment removes the list of items for compliance and simply points to the requirements in Chapter 11, so as not to inadvertently miss something. The plan established by the owner still needs to be approved by the fire official.**

Note: NAHB has a "neutral" position on those proposals not listed in this guide.

International Property Maintenance Code

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
PM12		This proposal adds a new section addressing radon stating that radon levels shall be tested in multi-family buildings in accordance with ANSI-AARST standards.	Support Standing Motion (D)	It is unclear how often testing should be carried out. The committee felt the requirement should not include Zone 3 and that some allowances should be made for historical structures.
	PC 1	Modifies the proposal to require radon testing for all dwellings, not only multi-family buildings, and replaces the requirement to meet the AARST standard with a threshold of 4 pCi/L.	Oppose	The proposal was overwhelmingly defeated by the committee, but the public comment expands the scope of the requirement to now include all dwellings. There is also no time period specified for testing. Is a passing test required at each visit to the property?

International Fire Code

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
F8		The proposal adds a definition for Valet Waste and a new provision prohibiting valet waste collection except where approved by the fire code official.	Oppose Standing Motion (AM) Support (AMPC 1 and AMPC 2) or Support (D)	The code should regulate how valet trash services can be provided safely rather than banning them outright unless the fire code official is willing to work with building owners and managers to permit such services.
	PC 1	Modifies the proposal to allow the fire code official to establish a permitting requirement for valet trash collection.	Support	The public comment empowers the fire code official to require an operational permit for valet trash collection instead of banning the service outright unless the fire code official opts to allow it.
	PC 2	Modifies the proposal to clarify valet trash collection is an intermediary service that removes materials for final collection.	Support	The public comment clarifies any prohibition on valet trash collection does not apply to traditional curbside trash collection by municipal or private services.
	PC 3	Requests Disapprove.	Support	
	PC 4	Requests Disapprove.	Support	
F15, Part 1		The proposal adds definitions for Landscaped Roof and Vegetative Roof and changes landscaped to vegetative roof in several places.	Support (AMPC 1) or Support Standing Motion (AS)	The proposal coordinates proper terminology for landscaped and vegetative roof systems.
	PC 1	Modifies the proposal to clarify a landscaped roof is an area over a roof assembly and to remove the reference to landscape elements in the vegetative roof definition.	Support	The public comment further clarifies the distinction between a landscaped roof and a vegetative roof.
F15, Part 2		The proposal adds a definition for Landscaped Roof and changes landscaped to vegetative roof in Section 1505.10	Support (AMPC 1 and AMPC 2) or Support Standing Motion (AS)	The proposal coordinates proper terminology for landscaped and vegetative roof systems.

* Significant proposals are in bold

	PC 1	Modifies the proposal to clarify a landscaped roof is an area over a roof assembly and to remove the reference to landscape elements in the vegetative roof definition.	Support	The public comment further clarifies the distinction between a landscaped roof and a vegetative roof.
	PC 2	Modifies the proposal to clarify fire resistance and fire classification requirements apply to both vegetative and landscaped roofs.	Support	The public comment clarifies the intent of the code is for both landscaped roofs and vegetative roofs to meet fire classification requirements.
F25		The proposal adds new requirements for powered micromobility devices.	Oppose Standing Motion (AS) Support (AMPC 1) or Support (D)	The proposal would technically limit the number of such devices owned or otherwise possessed by the tenants in a multifamily building to a total of five devices for the entire building. This raises questions as to how the provisions would be enforced for residential occupancies.
	PC 1	Modifies the proposal to remove the limit of 5 powered micromobility devices in residential occupancies and clarify the required 18-inch separation during charging is between the location of the batteries on the powered micromobility devices.	Support	This public comment addresses NAHB's concerns with the proposal by removing the unenforceable limit on the total number of devices that could be owned or otherwise possessed by the occupants of a dwelling or multifamily building.
	PC 2	Modifies the proposal to clarify the 5-device limit applies to individual dwelling units and expands the definition to apply to personal mobility devices powered by any sort of rechargeable battery.	Oppose	The public comment does not address the concern about regulating how many devices an individual homeowner or renter can possess.
F27		The proposal requires evacuation diagrams in Group R-3 transient occupancies (e.g. B&B's).	Support Standing Motion (D)	This proposal is not needed as these occupancies are likely to have operable windows in sleeping rooms that are also sized as emergency escape & rescue openings. They can also be single-exit buildings and are not required to have fire alarm systems.
	PC 1	Modifies the proposal to remove the requirement to show the location of the nearest fire alarm boxes on the evacuation diagram.	Oppose	The public comment does not remove the need to include the procedures to be followed when a fire alarm sounds.
F28		The proposal adds a requirement for a fire safety and evacuation plan for occupancies where lithium-ion and lithium metal batteries are developed, tested, manufactured or stored.	Support (AMPC 1) or Support Standing Motion (AM)	The proposal as modified by the committee ensures fire safety and evacuation plans are established for buildings and structures where such batteries are handled and stored while providing appropriate exemptions for owners and tenants of houses and multifamily units.
	PC 1	Modifies the proposal to remove the need for devices in dwellings, dwelling units and sleeping units to be for personal use.	Support	The public comment removes an unenforceable requirement.
F30		The proposal relocates the exceptions from the 150-foot distance for fire apparatus access roads to apply to all requirements for such roads.	Support Standing Motion (D)	The proposal would likely result in fire code officials requiring dwellings be sprinklered as a condition of granting a variance to any characteristic of a fire department apparatus access road, in lieu of less-costly alternative methods of fire protection.
	PC 1	Modifies the proposal by relocating the requirement for fire apparatus access roads to the proposed exception.	Oppose	The public comment inappropriately places the requirement to provide at least one fire department apparatus access road in an exception to the base code provisions.

* Significant proposals are in bold

F72		**This proposal allows NFPA 13R sprinkler systems to be installed in Group R occupancies where the floor level of the highest story is 35 feet or less.**	**Oppose Standing Motion (D) Support (AMPC 1), (AMPC 2) or (AMPC 3)**	**The change to the 2021 codes should have addressed podium-style buildings only, but it also affects stand-alone 4-story R occupancy structures. All three public comments are meant to give relief to these buildings which have an outstanding safety record with a NFPA 13R sprinkler system installed.**
	PC 1	**Limits the height increase to buildings where firewalls have not been used to define multiple buildings.**	**Support**	**This public comment allows R-2 occupancy buildings to have the highest floor level at 35 feet before a full NFPA 13 sprinkler system is required. The entire structure must comply with the area limits of Chapter 5. A NFPA 13R system would not be allowed if an additional building or increased area associated with the use of firewalls is incorporated.**
	PC 2	**Limits the change in threshold to the highest story without changing the number for the lowest story as in the original proposal.**	**Support**	**13R sprinklers are currently allowed by the NFPA standard in buildings up to 4 stories and 60 feet in height. The 35-foot height proposed in this public comment is well below the 60-foot threshold and more realistically allows for 4-story Group R buildings with floor-to-ceiling heights of 8 to 10 feet which is common in multifamily buildings.**
	PC 3	**Sets the limit for the roof assembly to 45 feet before a full NFPA 13 sprinkler system is required for R-2 occupancies.**	**Support**	**This public comment addresses the use of mezzanines in upper levels of Group R-2 occupancies. It is modeled after what has already been approved in the 2018 edition to address attic protection in NFPA 13R buildings (Section 903.3.1.2.3).**
F73		This proposal intends to clarify that 13D sprinkler systems do not require an alarm.	Oppose Standing Motion (D) Support (AMPC 1)	This proposal states specifically that audible alarms are required for NFPA 13 and 13R systems. NAHB did not support or oppose this proposal.
	PC 1	Makes multiple modifications to the text and removes requirement for an outside alarm for one- and two-family dwelling sprinkler systems.	Support	There was general agreement at the hearing that one- and two-family dwellings should not require exterior water flow alarms. This public comment limits the exception to such buildings and does not include other structures which are allowed to have a NFPA 13D system installed.
F103		This proposal requires carbon monoxide detection in the contiguous living areas of Group R-1 occupancies and R-2 dormitories.	Support Standing Motion (D)	Adding the definitions makes the provision more confusing.
	PC 1	Modifies the proposal by requiring a CO alarm to always be installed within the sleeping area as well as outside of it.	Oppose	The committee disapproved the proposal, because they did not see anything wrong with the section as it is currently worded in the code. And the public comment is even more restrictive than the original proposal.
F111		**This proposal requires that a systematic plan of correction is established when work is required under Chapter 11.**	**Oppose Standing Motion (D) Support (AMPC 1) or (AS)**	**This proposal addresses the lack of direction to the code official when setting a timeframe for corrections for existing buildings. The fire code official remains the ultimate decider, but it allows the building owner to give input regarding construction realities.**

* Significant proposals are in bold

	PC 1	**Modifies the proposal by clarifying the roles of the fire official and the owner.**	**Support**	**The comment removes the list of items for compliance and simply points to the requirements in Chapter 11, so as not to inadvertently miss something. The plan established by the owner still needs to be approved by the fire official.**
F153		This proposal modifies requirements for installation of batteries.	Support Standing Motion (AS)	This proposal coordinates with the IRC.
	PC 1	This public comment adds a testing standard and requires code officials to review test data.	Oppose	This is an inappropriate use of a UL standard which is intended for listing purposes, not for requiring code officials to review test data from product manufacturers. Listing agencies review test data.
F155		This proposal adds new provisions for how to comply with the existing requirements for protecting batteries from vehicle damage/impact.	Support (AMPC 1) or Support Standing Motion (AS)	AMPC1 is the preferred choice because it coordinates and clarifies the provisions.
	PC 1	Modifies the proposal to clarify definition of the normal driving path and provides technical and coordination fixes.	Support	This public comment resolves all technical and coordination issues with the proposal. It revises the definition of the normal driving path which is the key concept needed to correctly implement the new provisions. It also improves coordination between the text and the figure.
F230		**The proposal adds an exception permitting fire apparatus access roads to be a sidewalk, driveway, pathway or other approved surface not accessible to motor vehicles.**	**Oppose Standing Motion (D) Support (AMPC 1)**	**The proposal clarifies the second fire apparatus access road doesn't have to be an actual road open to public traffic and codifies alternatives that are frequently used by developers and approved by fire code officials.**
	PC 1	**Modifies the proposal to add a pointer to the base code requirements for fire apparatus access roads and emphasize such roads need to have marking or signs.**	**Support**	**The public comment addresses the committee concerns that these alternative driveways or pathways need to meet the appropriate dimensional requirements, be maintained free of obstructions and have permanent marking or signage.**
F231		**The proposal adds an exception raising the trigger for a second fire apparatus access road to 50 dwellings if the width is 26 feet and the development is not in a wildland-urban interface area.**	**Oppose Standing Motion (D) Support (AMPC 1)**	**This proposal provides modest relief from the requirement to provide the second road or sprinkler all the dwellings.**
	PC 1	**Modifies the proposal to create a separate section for developments with 50 homes or fewer, add pointers to the minimum width and turnaround requirements, and require at least one fire hydrant on each side of the road.**	**Support**	**The public comment addresses the concerns that fire hydrant location and spacing need to be considered and provides clarity by creating a new section covering developments with 31 to 50 homes.**

* Significant proposals are in bold

International Wildland-Urban Interface Code

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
WUIC2		**The proposal adds a requirement for a check valve in a valve box to be installed in service lines.**	**Support Standing Motion (D)**	**The proposal may require a manhole to access the valve in colder climates (e.g., Alaska) where the service lines may need to be down several feet. No post-wildfire assessment reports were provided to substantiate this is a problem.**
	PC 1	**Modifies the proposal to apply to utility water service only and allow any approved method of protection from back-siphonage.**	**Oppose**	**The public comment does not address the issues with the proposal, may result in more costly solutions being required, and does not provide evidence of problem with new buildings constructed to the IWUIC that would justify the required protection.**
WUIC3		The proposal clarifies certain buildings in areas of high or extreme wildfire hazards are required to have exterior walls with 1-hour fire ratings and noncombustible exterior surfaces.	Support Standing Motion (D)	The proposal would prohibit log wall construction in higher-hazard portions of the wildland-urban interface area unless the exterior face of the logs is covered with a noncombustible or fire-retardant-treated wood covering.
	PC 1	Modifies the proposal to require exterior walls of IR 1 construction in certain high- or extreme hazard areas have a 1-hour fire-resistance rating and the exterior surfaces of such walls meet requirements for ignition-resistant materials.	Oppose	The public comment would effectively require logs used for log wall construction be tested to ASTM E84 or E2768 if intended to be left exposed to the exterior.
WUIC6		The proposal adds language prohibiting the use of paints, coating, stains or other surface treatments to provide ignition resistance.	Support Standing Motion (D)	The proposal ignores the fact there are intumescent products tested to ASTM E84 or UL 723 with ICC-ES or other evaluation reports that could comply with Section 503.2, some of which could be used on materials other than wood, and would knock those products out of the market.
	PC 1	Requests As Submitted.	Oppose	
WUIC9		The proposal reorganizes the ignition-resistant material provisions to group fire-retardant treated wood, weathering, and other requirements.	Support Standing Motion (D)	The proposed reorganization makes products other than FRTW and plastic lumber seem like alternative methods of construction. No evidence was provided code users in wildfire-prone regions find the section is overly complicated.
	PC 1	Modifies the proposal to move all weathering requirements to one section and renames a section to "ignition-resistant building material".	Neutral	The public comment addresses the issue of making products other than FRTW and plastic lumber seem like alternative methods of construction but has not provided evidence code users in wildfire-prone regions find the section as currently organized overly complicated.
WUIC11		The proposal adds a requirement exterior surfaces of exterior walls be noncombustible for 6 inches vertically from ground or decking.	Support Standing Motion (D)	The proposal could create issues with trying to flash the intersection of an attached deck with the adjacent dwelling and limit the types of flashing that can be used. The proposal does not address the condition where the exterior wall is already 1-hour rated with a noncombustible layer of Type X gypsum board under the exterior cladding.

* Significant proposals are in bold

	PC 1	Modifies the proposal to require 6 inches of metal flashing or noncombustible material be provided vertically on the exterior of the wall.	Oppose	The public comment would complicate flashing details at a deck ledger and could result in leaving a path for moisture to reach the ledger and attachments.
WUIC13		The proposal revises exterior wall requirements to separate flame propagation and flame impingement performance requirements.	Support Standing Motion (D)	The proposal appears to require heavy timber and log wall construction pass NFPA 285 or ASTM E2707 testing regardless of building height. No exceptions are provided even for a dwelling constructed under the IWUIC.
	PC 1	Modifies the proposal to raise the flame exposure for flame propagation testing to a 150-kilowatt exposure.	Oppose	The public comment does not address the concerns with subjecting assemblies to ASTM E2707 testing.
WUIC15		**The proposal revises vent requirements to list all the locations where vents need to prevent flame and ember intrusion and require vents in IR-1 and IR-2 construction be tested to ASTM E2886 and listed.**	**Oppose Standing Motion (AS) Support (D)**	**The proposal would unreasonably increase cost by requiring builders use tested and listed products rather than common, generic materials with a tighter mesh spacing in 2 of the 3 wildfire risk zones. The requirements have been extrapolated far beyond what is recommended by the referenced IBHS research.**
	PC 1	**Modifies the proposal to add prescriptive requirements for covering vents in IR-1 and IR-2 construction with a noncombustible corrosion-resistant mesh with maximum 1/8-inch openings.**	**Oppose**	**The public comment does not address the issue that the proposal exceeds the recommendations of the IBHS report.**
	PC 2	**Modifies the proposal to add prescriptive alternatives for covering vents in IR-1 and IR-2 construction with a noncombustible corrosion-resistant mesh with maximum 1/8-inch openings.**	**Oppose**	**The public comment places the prescriptive options on a lower footing by referring to them as alternatives and does not address the issue that the proposal exceeds the recommendations of the IBHS report.**
	PC 3	**Requests Disapproval.**	**Support**	

* Significant proposals are in bold

International Mechanical Code

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
M18		This proposal requires the design of exhaust-only ventilation systems for R occupancies to include dedicated outdoor air for each dwelling unit.	Support Standing Motion (D)	The IBC does not prohibit exhaust-only ventilation systems, despite the claims in the substantiation. As shown, the proposed text does not present a significant technical change because it simply moves the deleted language into an exception. In addition, entry doors are already required to be air sealed.
	PC 1	Replaces the proposal and requires outdoor air to be supplied to each dwelling unit mechanically.	Oppose	Passive options for incoming air should remain in the code as a design choice. Make-up air for exhaust ventilation can be provided with trickle vents that can be incorporated into windows. A Home Innovation Research Labs cost analysis shows the cost impact of installing an ERV solution is about $1,150 higher compared to passive inlets.
M19		**This proposal requires local exhaust systems and ventilation systems in residential occupancies greater than three stories to comply with the provisions under 403.3.2.**	**Oppose Standing Motion (AM) Support (D) or (AS)**	**No evidence was provided that dwellings built to current requirements are under-ventilated. Unnecessary ventilation will lead to increased moisture in humid climates and dry conditions in cold climates, requiring supplemental dehumidification or humidification depending on the climate. There are significant added construction costs and increased energy use due to heating/cooling the air, humidity control, and fan power. Dedicated humidity control equipment is onerous and expensive to maintain.**
	PC 1	**Requests Disapproval.**	**Support**	
	PC 2	**Requests Disapproval.**	**Support**	
M25		This proposal requires all mechanical systems to be sized for a design airflow to accommodate a MERV 13 filter and for all occupiable spaces to have extra electrical receptacles.	Support Standing Motion (AM) or Support (AMPC 1) or (AMPC 2)	The proponent stated the purpose of the proposal was to address Covid. However, MERV 13 filters are not rated appropriately for this. Larger fans and duct sizes will impose an energy and cost penalty. This change would also apply to mini-splits, which are not filtration devices. One result of the modification approved by the committee is that residential occupancies were exempted from this requirement.
	PC 1	Modifies the proposal by removing the requirement for zonal filtration or disinfection capability.	Neutral	
	PC 2	Modifies the proposal by limiting the scope of the appendix to Groups A, B, E and I occupancies.	Neutral	
	PC 3	Requests As Modified.	Support	See errata.

* Significant proposals are in bold

M26		This proposal requires each occupiable space to be equipped with a carbon dioxide sensor.	Support Standing Motion (D)	The studies this change is based on only measured CO2 levels in schools. The proposal should be limited to education occupancies.
	PC 1	Modifies the proposal by moving it to an appendix and limiting it to A, B, E, and I occupancies.	Oppose	The public comment still attempts to require CO2 sensors in occupancies that were not part of the study referenced in the reason statement.
M33		**This proposal prohibits a ductless range hood from being installed in new construction.**	**Support Standing Motion (D)**	**This is a ban on re-circulation range hoods, and sufficient evidence to justify an outright ban was not provided. A recirculation hood in combination with overall ventilation should remain an option for designers, because it remains an appropriate choice in some design situations.**
	PC 1	**Modifies the proposal by requiring existing kitchens to have mechanical or natural ventilation before a ductless range hood is allowed.**	**Oppose**	**This makes installing re-circulation range hoods in existing dwellings overly restrictive. Simply swapping out a range hood will require interior kitchens to have ductwork for mechanical ventilation run to the exterior.**
M50		This proposal requires radon control systems to comply with AARST CC1000.	Support Standing Motion (D)	No builders were on the standard development committee. The scope is also too broad: Not all areas have a radon problem, so this needs to be limited to Zone 1.
	PC 1	Modifies the requirement to meet AARST standard CC-1000 with a threshold of 4 pCi/L.	Oppose	This comment removes the problematic AARST standard, but it is still too broad.
M52		This proposal allows return air to be taken from bathrooms.	Oppose Standing Motion (D) Support (AMPC 1)	This proposal removes a prohibition for return air from bathrooms. This change addresses real problems with humidity due to stagnant air.
	PC 1	Modifies the proposal by allowing return air to be taken from a bathroom that contains a toilet room.	Support	Bathrooms and toilet rooms contain exhaust fans to control odors, but a return air opening would allow for better control of moisture-laden air in humid regions.
M54		This proposal allows return air to be taken from a mechanical room under certain circumstances.	Oppose Standing Motion (D) Support (AS)	This proposal removes a prohibition for return air from boiler rooms, furnace rooms and mechanical rooms. This change addresses real problems with humidity due to stagnant air.
	PC 1	Requests As Submitted.	Support	
M56		This proposal intends to clarify how plenums are permitted to be constructed.	Oppose Standing Motion (D) Support (AS)	This clarifies that stud cavity and joist space plenums are an accepted option for constructing plenums by placing them under Section 602.2.
	PC 1	Requests As Submitted.	Support	
M66, Part 2		This proposal intends to correlate the requirements for safety and relief valve discharge for boilers.	Oppose Standing Motion (D) Support (AMPC 1)	The proposal intends to correlate the requirements for the T&P valve discharge, but it adds an extra requirement. Item 15 in the list is not in the IRC plumbing section for relief valves (P2804.6.1).
	PC 1	Modifies the proposal by removing the requirement for cutting the end of the discharge pipe at an angle.	Support	The public comment removes Item 15, which is not found in other sections with requirements for discharge pipes.

* Significant proposals are in bold

International Plumbing Code

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
P1		**This proposal creates a new table with drainage fixture units for bathroom groups.**	**Oppose Standing Motion (D) Support (AMPC 1) or (AS)**	**This change is based on research that shows that a reduction in the sizing for drain pipe is called for in buildings with three or more bathrooms. It would allow for smaller drain pipe sizes in certain buildings, such as multifamily.**
	PC 1	**Modifies the proposal by clarifying the usage of the columns in the table.**	**Support**	**The public comment addresses the committees concerns and still reduces the oversizing of drainage piping.**
P85		This proposal limits the requirements for individual shutoff valves to multiple-tenant buildings with three or fewer stories.	Oppose Standing Motion (D) Support (AMPC 1)	Water distribution pipes in taller buildings have a vertical instead of horizontal orientation. Therefore, it is not possible to provide a separate shut off valve for the entire tenant space
	PC 1	Modifies the proposal editorially without changing the intent.	Support	The public comment is similar to the original proposal. NAHB continues to support the change.
P87, Part 1		**This proposal requires shower heads to comply with WaterSense specifications and have a maximum flow of 2.0 gpm at 80 psi.**	**Oppose Standing Motion (AM) Support (D)**	**This is another attempt to bring WaterSense into the code. It is not referenced in the IPC, and ICC membership has consistently opposed adding it. The plumbing fixture and fitting water consumption requirements in the IPC are based on federal requirements and therefore should remain unchanged until federal requirements are changed.**
	PC 1	**Requests Disapproval.**	**Support**	
P87, Part 2		**This proposal requires shower heads to comply with WaterSense specifications and have a maximum flow of 2.0 gpm at 80 psi.**	**Support Standing Motion (D)**	**This is another attempt to bring WaterSense into the code. It is not referenced in the IPC, and ICC membership has consistently opposed adding it. The plumbing fixture and fitting water consumption requirements in the plumbing portion of the IRC are based on federal requirements and therefore should remain unchanged until federal requirements are changed.**
	PC 1	**Modifies the proposal by removing the reference to WaterSense but retains the max 2.0 gpm flowrate requirement.**	**Oppose**	**Even though the WaterSense reference is removed, the requirements are the same. The reason for opposing is the same as the original proposal.**
	PC 2	**Requests Disapproval.**	**Support**	
P129, Part 1		This proposal expands the requirements for cure-in-place rehabilitation of sewer piping.	Support Standing Motion (D)	The change includes installation instructions and inspection requirements that are too specific and which cannot be reasonably enforced. Does the code official have the expertise to determine whether defects exist that prevent the insertion and expansion of the cured-in-place pipe materials (new Section 718.5)?

* Significant proposals are in bold

	PC 1	Modifies the proposal by changing the definition and removing the ASTM standards.	Oppose	The public comment still includes unnecessary installation instructions.
	PC 2	Modifies the proposal by changing the definition and combining several sections.	Oppose	The problems with the original proposal remain.
P129, Part 2		This proposal expands the requirements for cure-in-place rehabilitation of sewer piping.	Support Standing Motion (D)	The change includes installation instructions and inspection requirements that are too specific and which cannot be reasonably enforced. Does the code official have the expertise to determine whether the existing piping is able to be rehabilitated (new Section P3012.4)?
	PC 1	Modifies the proposal by changing the definition and removing the ASTM standards.	Oppose	The public comment still includes unnecessary installation instructions.
	PC 2	Modifies the proposal by changing the definition and combining several sections.	Oppose	The problems with the original proposal remain.

International Residential Code – Mechanical

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RM1		**This proposal introduces a new requirement for permanent attic stairs for all cases with equipment in the attic.**	**Support Standing Motion (D)**	**Permanent attic stair will result in occupants using vented attics as storage - this will lead to compacted or removed ceiling insulation. The proposal does not allow horizontal access. Pull-down stairs are difficult to insulate and air seal. The permanent stair will prevent the use of mechanical lifts. The proposed language does not address solutions using filters at air returns. Not cost-effective to add $700+ to a house. IMC does not have a parallel requirement. Larger opening size will also limit placement choices in the ceiling.**
	PC 1	**Modifies the proposal without changing the intent.**	**Oppose**	**Public comment makes the language less clear and more onerous. "New construction" is not a defined term and may apply to additions. Adds an erroneous reference to Section M1305.1 which addresses only the issues of (1) not blocking the equipment with permanent elements and (2) the need for a level working space. The new cost estimate is inaccurate - costs have gone up since, not down, and it does not account for installation labor and for costs to air seal and insulate.**

* Significant proposals are in bold

RM3		This proposal requires compliance with a new ASHRAE standard on A2L refrigerants.	Support Standing Motion (D)	The proposed reference standard is incomplete and not ready for publication. This change is in direct conflict with RM6 which did not receive any public comments and is now final. RM6 addresses the same subject enabling the use of the new refrigerants. The reference standard contains many provisions that do not apply to builders or code officials and covers multifamily buildings.
	PC 1	Requests As Submitted	Oppose	
RM8		This proposal introduces make-up air requirements for clothes dryers where exhaust exceeds 200 cfm.	Support Standing Motion (D) or Support (AMPC1)	This is a partial copy-and-paste from the Fuel Gas chapter, but it fails to bring the definitions along to make this work. Further, this will create a conflict with kitchen make-up air requirements.
	PC 1	Public comment adds definition of make-up air and modifies the corresponding kitchen provisions.	Support	
RM9		**This proposal prohibits ductless range hoods in new construction.**	**Support Standing Motion (D)**	**This is a ban on ductless range hoods. The proponent did not provide sufficient evidence to justify an outright ban. Ductless range hoods in combination with overall ventilation requirements should remain an option for designers. Ductless range hoods are used in highly energy efficient homes in Canada, Europe, and USA.**
	PC 1	**Public comment maintains the prohibition on ductless range hoods and introduces a circular reference into the code.**	**Oppose**	**Code compliant ductless range hoods should remain a design choice. The public comment removes this choice. Furthermore, the public comment incorrectly sends the user to Section M1505 for requirements to provide kitchen exhaust ventilation. Section M1505 only provides specification for how to design and install mechanical ventilation systems. Section M1503 establishes requirements for vented vs ventless design choices.**
RM15		**This proposal increases the whole-house ventilation rates using a sliding scale.**	**Support Standing Motion (D)**	**The proposal does not provide evidence that the current ventilation rates are inadequate. Hundreds of thousands of homes have been built based on the current ventilation rates. Increasing rates will lead to humidity issues and increased energy use. This will trigger supplemental dehumidification or humidification in many parts of the country. The cost impact is grossly understated and misrepresented.**
	PC 1	**Modifies proposal by increasing the ventilation rates without justification.**	**Oppose**	**Public comment requires even higher ventilation rates than the proposal without evidence that the current rates are inadequate. ASHRAE models are not reliable predictors of air exchange over short time spans. Inflated ventilation rates will lead to humidity issues and increased energy use. Supplemental humidity control measures are onerous and expensive to install and maintain. The cost impact of the further rate increase is not addressed in the cost statement for public comment.**

* Significant proposals are in bold

	PC 2	**Requests Disapproval.**	**Support**	
	PC 3	**Requests Disapproval.**	**Support**	
RM19		This proposal allows return air to be drawn from closets.	Oppose Standing Motion (D) and Support (AMPC1)	This proposal removes a prohibition for return air from closets and adds implementation provisions. This change addresses real problems with humidity due to stagnant air. Support PC1 with improved language.
	PC 1	Public comment clarifies the language. Serves the same intent.	Support	Public comment further clarifies the use of air returns in closets. Improved language.
RM20		This proposal allows return air to be drawn from mechanical rooms.	Oppose Standing Motion (D) and Support (AMPC1)	This proposal removes a prohibition for return air from mechanical rooms and adds implementation provisions. This change addresses real problems with humidity due to stagnant air. Support PC1 with improved language.
	PC 1	Public comment clarifies the language. Serves the same intent.	Support	Public comment further clarifies the use of air returns in mechanical rooms. Improved language.

International Residential Code – Plumbing

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
RP10		Reduces the developed length of hot water runs from 100ft to 75ft	Support Standing Motion (D)	This is a reduction from an agreement that NAHB had with some of the proponents last cycle. The 100-ft threshold is practical for most typical homes. At 75 ft, larger homes may require two water heaters.
	PC 1	Modifies the maximum developed length to allow for hot water piping up to 85ft.	Oppose	This is an unnecessary attempt to incrementally modify the language. NAHB remains in opposition for the reasons stated for the original proposal.
	PC 2	Requests As Submitted.	Oppose	

* Significant proposals are in bold

International Building Code – Egress

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
E40		This proposal addresses a conflict between the 20” minimum clear door width of non-accessible shower compartments and 36”x36” shower compartments with sliding doors.	Support Standing Motion (AS)	This code change fills in a gap of where there was a conflict of minimum clear door widths of non-accessible shower compartments and those that cannot accommodate that width because of a 36-inch wide shower compartment sizing.
	PC 1	Modifies the proposal to require access to shower compartments comply with Section 421.4.2 of the IPC.	Oppose	The public comment reverts to the IPC for a shower compartment door's minimum clear opening width rather than try and address how an existing shower compartment of limited size would need to address the size of door opening for access to a non-accessible shower use. It also does not consider that a swinging door for a shower compartment might not be feasible if another bath fixture such as a toilet or sink prevents the shower door from fully swinging open. This would result in a sliding shower door being the only option, which is what the original proposal is addressing.
E112		This proposal revises the emergency escape and rescue requirements to allow those to open directly into a public way or to a yard or court that open into or has access to a public way.	Oppose Standing Motion (D) Support (AM)	The proposal makes a necessary code language change to correlate emergency escape and rescue opening language between the IBC and IRC and is meant to address empty infill lots where a builder will construct a townhouse or rowhouse to match those on either side, including a basement that may not have been built to follow current EERO requirements.
	PC 1	Modifies the proposal to add an exception stating that an emergency escape and rescue opening shall not be required to open directly into a yard or court that opens directly to a public way.	Support	The emergency escape and rescue opening would not be required to open directly into a yard or court that opens directly to a public way provided the court or yard opens to an unobstructed path. The path would have a width of not less than 36-inches. The changes in this public comment takes the language that was approved during the 2019 Group B code cycle and correlating that with this proposed change in the IBC allowing a path that occupants of each dwelling to use for escape.
E132		In Group R-2 occupancies containing more than 20 dwelling or sleeping units, this proposal revises the percentage of Type A units from 2% to 5%.	Support Standing Motion (D)	Federal agencies providing loans, grants and credits can set their own rules that may exceed minimum code. That should not be used to justify raising the bar for every Group R-2 building in the country including all those built entirely with private funds.
	PC 1	Requests As Submitted.	Oppose	

* Significant proposals are in bold

International Building Code – Fire Safety

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
FS23		The proposal requires penetrations through fire-rated exterior walls be protected with fire-stopping. Ducts and air vents would require dampers.	Support Standing Motion (D)	The proposal represents a significant increase in cost for multifamily buildings where each unit has its own HVAC system and clothes dryer. However, no cases of fire intrusion through such relatively small penetrations have been provided that would justify the cost.
	PC 2	Modifies the proposal to relocate the section on penetrations, remove the pointer for ducts and air transfer openings, and deletes a duplicative section.	Oppose	The public comment does not address the issues with the proposal.
FS108		The proposal revises the exemption allowing exposed portions of heavy timber construction to require buildings be sprinklered to use the exemption.	Support Standing Motion (D)	The proposal affects all heavy timber buildings regardless of height, not just the new Type IV-A, B and C construction. No test data or case studies provided showing the limitation is needed.
	PC 1	Modifies the proposal to limit the heavy timber exception to Type IV-HT construction only.	Oppose	The public comment fixes the issue of changing requirements for traditional heavy timber, but still provides no justification why the exception for interior finishes should not apply to all Type IV buildings.
FS124		The proposal adds a definition for Engineering Analysis and a new section listing methods for complying with vertical and lateral flame propagation requirements.	Support Standing Motion (D) or Support (AMPC 1)	The proposal adds a definition of Engineering Analysis that conflicts with the use of the term elsewhere in code for the primary means of compliance, not as an alternative to existing tests or prescriptive designs.
	PC 1	Modifies the proposal to remove the definition of Engineering Analysis and clarifies an approved analysis should be based on an assembly or condition tested in accordance with and meeting the acceptance criteria of NFPA 285.	Support	The public comment removes the definition of Engineering Analysis that did not correlate with the use of the term elsewhere in the code.
FS146		This proposal adds a section to the EIFS provisions requiring compliance with NFPA 285 and Section 2603.5 containing fire safety provisions.	Support Standing Motion (D) or Support (AMPC 1)	The proposal would appear to require NFPA 285 testing for EIFS walls of any height even where the exceptions in Section 2603.5.5 apply.
	PC 1	Modifies the proposal to remove unnecessary language specifying NFPA 285 testing.	Support	The public comment removes language that could be taken to override current exceptions from NFPA 285 testing provided in Section 2603.5.

* Significant proposals are in bold

International Building Code – General

Prop #		Proposal/Comment Description	Public Comment Recommended Action & Vote	Reason Statement
G12		The proposal revises the definition of High-Rise Building to be triggered by the floor of an occupied story more than 75 feet above fire department access.	Oppose Standing Motion (D) Support (AS)	The proposal is consistent with the philosophy an occupiable roof is not a story unless enclosures for stairs and elevators serving the roof combined with other rooftop structures and penthouses exceed one-third the area of the roof. This avoids impacts that could fundamentally affect the floor layout such as triggering a fire command center or requiring separation of stairways just due to the occupiable roof.
	PC 1	Requests As Submitted.	Support	
G15		The proposal revises the definition of High-Rise Building to be triggered by an occupied floor or roof more than 75 feet above fire department access.	Oppose Standing Motion (AS) Support (D) or Support (AMPC 1)	The proposal does not provide any substantiation that an occupiable roof adds risk that requires the level of additional protection associated with triggering high-rise requirements simply due to additional occupants and furnishings. This change could trigger impacts that fundamentally affect the floor layout such as triggering a fire command center or requiring separation of stairways.
	PC 1	Modifies the proposal to define a high-rise building as one where either an occupied floor, or an occupied roof with 50 or more occupants, is more than 75 feet about the lowest level of fire department access.	Oppose	The public comment does not address concerns the occupiable portion of a roof may be only a small portion of the overall roof.
	PC 2	Requests Disapproval.	Support	
G16		The proposal revises the definition of High-Rise Building to be triggered by an occupied roof with more than 50 occupants or an occupied floor more than 75 feet above fire department access.	Support Standing Motion (D)	The proposal does not provide substantiation an occupiable roof adds risk that requires the level of additional protection associated with triggering high-rise requirements simply due to having more than 50 occupants on the roof. This change could have impacts that fundamentally affect the floor layout such as triggering a fire command center or requiring separation of stairways.
	PC 1	Requests As Submitted.	Oppose	
G20, Part 1		The proposal adds a definition for Occupiable Roof and changes "occupied roof" to "occupiable roof".	Support Standing Motion (AM)	The proposal clarifies when a portion of a roof needs to meet code requirements consistent with being an occupied space used by tenants and the general public versus those portions only accessed by maintenance workers.
	PC 1	Modifies the proposal to define an Occupiable Roof as an "uncovered space on a roof" rather than an exterior space.	Oppose	The public comment does not clarify the definition and raises questions whether a small tree or an overhanging eave or rake from a higher roof "cover" the occupiable roof.

* Significant proposals are in bold

G20, Part 2		The proposal adds a definition for Occupiable Roof and changes "occupied roof" to "occupiable roof".	Support Standing Motion (AM)	The proposal clarifies when a portion of a roof needs to meet code requirements consistent with being an occupied space used by tenants and the general public versus those portions only accessed by maintenance workers.
	PC 1	Modifies the proposal to define an Occupiable Roof as an "uncovered space on a roof" rather than an exterior space.	Oppose	The public comment does not clarify the definition and raises questions whether a small tree or an overhanging eave or rake from a higher roof "cover" the occupiable roof.
G66		This proposal adds several new definitions related to electric vehicles (EV) and provides new requirements for EV charging infrastructure and parking.	Support Standing Motion (D)	There are currently government incentives for EV charging equipment. If it is included in the IBC as a requirement, those incentives are likely to disappear. The proposal language should remain in the appendix and EV charging stations should be available as an option to building owners, including the charging equipment and spaces.
	PC 1	Modifies the proposal to remove EV charging requirements for non-residential occupancies and only include R-2 occupancies.	Oppose	The public comment creates requirements for EV capable spaces and infrastructure for multi-family buildings in the main body of the code.
	PC 2	Modifies the proposal to require one in 25 spaces to be an EVSE-installed space and places the EV charging infrastructure requirements in the appendix.	Oppose	The public comment calls for one parking space in 25 to be an EVSE-installed space where lighting for parking areas are installed at buildings.
	PC 3	Requests As Submitted.	Oppose	
G162		This proposal requires radon control systems complying with AARST CC-1000 to be installed in all Group E buildings.	Support Standing Motion (D)	No builders were on the standard development committee. The scope is also too broad: Not all areas have a radon problem, so this needs to be limited to Zone 1.
	PC 1	Modifies the requirement to meet AARST standard CC-1000 with a threshold of 4 pCi/L.	Oppose	This comment removes the problematic AARST standard, but it is still too broad.
G163		**This proposal requires radon control systems complying with AARST CC-1000 to be installed in all Group R-2 apartment buildings.**	**Support Standing Motion (D)**	**No builders were on the standard development committee. The scope is also too broad: Not all areas have a radon problem, so this needs to be limited to Zone 1.**
	PC 1	**Modifies the requirement to meet AARST standard CC-1000 with a threshold of 4 pCi/L.**	**Oppose**	**This comment removes the problematic AARST standard, but it is still too broad.**
G164		This proposal requires radon control systems to comply with AARST CC-1000.	Support Standing Motion (D)	No builders were on the AARST CC-1000 standard development committee. This is also too broad: Not all areas have a radon problem, so this needs to be limited to Zone 1.
	PC 1	Modifies the requirement to meet AARST standards CC-1000 and RRNC with a threshold of 4 pCi/L.	Oppose	This comment removes the problematic AARST standard, but it is still too broad.
G170		This proposal would remove the impact insulation rating requirement for floor/ceiling assemblies between a dwelling unit or sleeping unit and public service area below.	Oppose Standing Motion (D) Support (AM)	The airborne sound requirements in this section would still apply protecting dwelling units and sleeping units located above a public or service area from sound transmission created by airborne sounds (i.e. sound from appliances, tv's, talking, etc.) and provides a sensible and cost-effective change.

* Significant proposals are in bold

	PC 1	Modifies the proposal to remove unenforceable language for the impact sound requirements of the floor/ceiling assemblies between a dwelling or sleeping unit and a public or service area.	Support	The public comment clarifies that the responsibility to provide noise control and sound isolating products in the ceiling assembly would be put on the public/service tenant prior to occupancy.
G172		This proposal adds requirements for grab bars and stanchions bathtubs and showers affecting all R-occupancies.	Support Standing Motion (D)	The proposal would require various grab bars and stanchions at bathtubs and showers but makes no distinction between the unique uses for each R-occupancy (i.e. transient vs. permanent) and the impact on each. Nor does it consider the various design options the impact grab bars would have on the array tub designs and surfaces, wall arrangements and surfaces, or the preferences of homeowner who would object or remove such grab bars if they personally feel they are not in need of them.
	PC 1	Modifies the proposal to revise Section 1210.3 on grab bars and stanchions for Group-R occupancies to comply with NFPA 101, chapter 24, where provided.	Oppose	The public comment revises the language stating that grab bars and stanchions shall comply with NFPA 101, Chapter 24, which makes them a requirement for one and two-family dwellings. The public comment further revises the pointer for structural characteristics from chapter 12 to chapter 16, Section 1607.9.2 for a single concentrated load of 250 pounds.
	PC 2	Requests As Submitted.	Oppose	
G203		This proposal adds an appendix for radon control systems and requires them to comply with AARST standard CC-1000 or RRNC.	Support Standing Motion (D)	No builders were on the AARST CC-1000 standard development committee. The scope is also too broad if adopted: Not all areas have a radon problem, so this needs to be limited to Zone 1.
	PC 1	Modifies the requirement to meet AARST standards CC-1000 and RRNC with a threshold of 4 pCi/L.	Oppose	This comment removes the problematic AARST standards, but it is still too broad if the appendix is adopted.

* Significant proposals are in bold

Notes:

Construction, Codes & Standards
National Association of Home Builders
1201 15th Street, NW
Washington, DC 20005
800-368-5242 x8300 ▪ codes@nahb.org