ICC Group A Online Governmental Consensus Vote
NAHB Proposal List

International Building Code – Egress

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
E40	As Submitted	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.	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.
E112	As Modified	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.	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.
E132	**Disapprove**	**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%.**	**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.**

International Fire Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
F8	Disapprove	The proposal adds a definition for Valet Waste and a new provision prohibiting valet waste collection except where approved by the fire code official.	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.
F15, Part 1	As Modified by Public Comment 1	The proposal adds definitions for Landscaped Roof and Vegetative Roof and coordinates the proper terminology for these roof systems throughout the code.	The proposal coordinates proper terminology for landscaped and vegetative roof systems. The public comment further clarifies the definitions for landscaped and vegetative roofs.
F15, Part 2	As Modified by Public Comment 1, 2	The proposal adds a definition for Landscaped Roof and coordinates proper terminology for landscaped and vegetative roof systems throughout the code.	The proposal coordinates proper terminology for landscaped and vegetative roof systems. The public comment further clarifies the definitions of landscaped and vegetative roofs.
F25	As Modified by Public Comment 1	The proposal adds new requirements for powered micro mobility devices including provisions for battery charging areas and limits on where charging devices is permitted.	The proposal addresses concerns with charging multiple lithium-ion battery-powered devices (e.g. electric scooters, hoverboards and e-bikes) in close proximity to each other. The public comment removes an unenforceable limit on the total number of devices that could be possessed by the occupants of a house or of a dwelling unit in a multifamily building.

Note: Proposals in Bold are high priority.

F27	Disapprove	The proposal requires evacuation diagrams in Group R-3 transient occupancies (e.g. B&B's).	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.
F28	As Modified	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.	The proposal adds fire safety and evacuation plans for buildings and structures where lithium-ion batteries are handled and stored. Committee and public comment modifications provide appropriate exemptions for owners and tenants of houses and multifamily units.
F30	Disapprove	The proposal relocates the exception from requiring all portions of a building be within 150 feet of a fire apparatus access roads if the building is sprinklered to apply to any aspect of such roads.	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.
F72	**As Modified by Public Comment 3**	**The public comment allows NFPA 13R sprinkler systems to be installed in Group R-2 occupancies where the height of the roof assembly is 45 feet or less.**	**The change to the 2021 codes should have addressed podium-style buildings only, but it also affects stand-alone 4-story R occupancy structures. The public comment gives relief to these buildings which have an outstanding safety record with a NFPA 13R sprinkler system installed. It addresses the use of mezzanines in upper levels of Group R-2 occupancies and 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	As Modified by Public Comment 1	This proposal intends to clarify that 13D sprinkler systems do not require an alarm.	The committee agreed 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.
F111	**As Submitted**	**This proposal requires that a systematic plan of correction is established when work is required under Chapter 11.**	**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.**
F153	As Submitted	This proposal modifies requirements for installation of batteries.	This proposal coordinates with the IRC.
F155	As Modified by Public Comment 1	This proposal adds new provisions for how to comply with the existing requirements for protecting batteries from vehicle damage/impact.	AMPC1 coordinates and clarifies the provisions.
F230	**As Submitted**	**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.**	**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.**
F231	**As Submitted**	**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.**	**This proposal provides modest relief from the requirement to provide the second road or sprinkler all the dwellings.**
F236	As Modified	The proposal adds a new appendix on Valet Trash and Recycling Collection in Group R-2 Occupancies for jurisdictions that want to permit such services.	The proposal supplies a reasonable and consistent set of requirements for providing valet trash services that a building owner or manager and the fire code official can work from, rather than having such services banned outright or having different jurisdictions come up with their own requirements.

Note: Proposals in Bold are high priority.

International Building Code – Fire Safety

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
FS23	Disapprove	The proposal requires penetrations through fire-rated exterior walls be protected with fire-stopping. Ducts and air vents would require dampers.	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 penetrations have been provided that would justify the cost.
FS108	Disapprove	The proposal revises the exemption allowing exposed portions of heavy timber construction to require buildings be sprinklered to use the exemption.	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.
FS123	Disapprove	The proposal adds a new section on vertical and lateral flame propagation with pointers to water resistive-barrier, metal composite material, EIFS and high-pressure laminate requirements.	The proposal overrides exceptions that only require exterior wall assemblies on certain low-rise buildings to meet flame spread and smoke development requirements, rather than requiring NFPA 285 testing. A proposal from the ICC Fire Code Action Committee that had a similar intent but correlated with the exceptions was approved at the Committee Action Hearings and by the consent agenda vote.
FS124	As Modified by Public Comment 1	The proposal adds a list of methods for complying with vertical and lateral flame propagation requirements including NFPA 285 testing and engineering analysis.	The proposal gives code recognition to engineering analysis used as an alternative to conduct NFPA 285 testing. The public comment removed a problematic definition of "engineering analysis" that conflicted with the existing use of the term elsewhere in the code.
FS146	As Modified by Public Comment	This proposal adds a section requiring EIFS wall assemblies be tested to NFPA 285 and comply with Section 2603 provisions for fire resistance and fire propagation.	The proposal reflects requirements for NFPA 285 testing for EIFS wall assemblies and other requirements for providing fire resistance and limiting fire propagation. The public comment removes language that could override current exceptions in from NFPA 285 testing provided in Chapter 26.

International Building Code – General

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
G12	As Submitted	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.	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.
G15	Disapprove	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.	The proposal does not provide any substantiation that an occupiable roof adds risk that requires 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.

Note: Proposals in Bold are high priority.

G16	Disapprove	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.	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.
G20, Part 2	As Modified	The proposal adds a definition for Occupiable Roof and changes "occupied roof" to "occupiable roof".	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.
G66	**Disapprove**	**This proposal adds several new definitions related to electric vehicles (EV) and provides new requirements for EV charging infrastructure and parking.**	**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.**
G162	**Disapprove**	**This proposal requires radon control systems complying with AARST CC-1000 to be installed in all Group E buildings.**	**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.**
G163	**Disapprove**	**This proposal requires radon control systems complying with AARST CC-1000 to be installed in all Group R-2 apartment buildings.**	**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.**
G164	**Disapprove**	**This proposal requires radon control systems to comply with AARST CC-1000.**	**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.**
G170	As Modified	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.	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.
G172	**Disapprove**	**This proposal adds requirements for grab bars and stanchions for bathtubs and showers affecting all R-occupancies.**	**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.**
G203	**Disapprove**	**This proposal adds an appendix for radon control systems and requires them to comply with AARST standard CC-1000 or RRNC.**	**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.**

Note: Proposals in Bold are high priority.

International Mechanical Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
M18	Disapprove	This proposal requires the design of exhaust-only ventilation systems for R occupancies to include dedicated outdoor air for each dwelling unit.	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.
M19	**Disapprove**	**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.**	**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.**
M25	As Modified by Public Comment	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.	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.
M26	Disapprove	This proposal requires each occupiable space to be equipped with a carbon dioxide sensor.	The studies this change is based on only measured CO2 levels in schools. The proposal should be limited to education occupancies.
M33	**Disapprove**	**This proposal prohibits a ductless range hood from being installed in new construction.**	**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.**
M50	**Disapprove**	**This proposal requires radon control systems to comply with AARST CC1000.**	**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.**
M52	As Submitted	This proposal allows return air to be taken from bathrooms.	This proposal removes a prohibition for return air from bathrooms. This change addresses problems with humidity due to stagnant air.
M54	As Submitted	This proposal allows return air to be taken from a mechanical room under certain circumstances.	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.
M56	As Submitted	This proposal intends to clarify how plenums are permitted to be constructed.	This clarifies that stud cavity and joist space plenums are an accepted option for constructing plenums by placing them under Section 602.2.
M66, Part 2	As Modified by Public Comment 1	This proposal intends to correlate the requirements for safety and relief valve discharge for boilers.	The public comment removes Item 15, which is not found in other sections with requirements for discharge pipes.

Note: Proposals in Bold are high priority.

International Plumbing Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
P1	**As Submitted**	**This proposal creates a new table with drainage fixture units for bathroom groups.**	**This change is based on research that shows that a reduction in the sizing for drainpipe is called for in buildings with three or more bathrooms. It would allow for smaller drainpipe sizes in certain buildings, such as multifamily.**
P85	As Modified by Public Comment 1	This proposal limits the requirements for individual shutoff valves to multiple-tenant buildings with three or fewer stories.	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
P87, Part 1	**Disapprove**	**This proposal requires shower heads to comply with Water Sense specifications and have a maximum flow of 2.0 gpm at 80 psi.**	**This is another attempt to bring Water Sense requirements into the code. It is not referenced anywhere else 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.**
P87, Part 2	**Disapprove**	**This proposal requires shower heads to comply with Water Sense specifications and have a maximum flow of 2.0 gpm at 80 psi.**	**This is another attempt to bring Water Sense 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.**
P129, Part 1	Disapprove	This proposal expands the requirements for cure-in-place rehabilitation of sewer piping.	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)?
P129, Part 2	Disapprove	This proposal expands the requirements for cure-in-place rehabilitation of sewer piping.	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)?

International Residential Code – Mechanical/Plumbing

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RM1	**Disapprove**	**This proposal introduces a new requirement for permanent attic stairs for all cases with equipment in the attic.**	**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.**
RM8	As Modified by Public Comment 1	This proposal introduces make-up air requirements for clothes dryers where exhaust exceeds 200 cfm.	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. Public comment addresses these concerns.
RM9	**Disapprove**	**This proposal prohibits ductless range hoods in new construction.**	**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.**
RM15	**Disapprove**	**This proposal increases the whole-house ventilation rates using a sliding scale.**	**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.**
RM19	As Modified by Public Comment 1	This proposal allows return air to be drawn from closets.	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.
RM20	As Modified by Public Comment 1	This proposal allows return air to be drawn from mechanical rooms.	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.

Note: Proposals in Bold are high priority.

International Residential Code – Mechanical/Plumbing

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RP10	Disapprove	Reduces the developed length of hot water runs from 100ft to 75ft	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.

WUIC

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
WUIC2	**Disapprove**	**The proposal adds a requirement for a check valve in a valve box to be installed in service lines.**	**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.**
WUIC3	Disapprove	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.	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.
WUIC6	Disapprove	The proposal adds language prohibiting the use of paints, coating, stains or other surface treatments to provide ignition resistance.	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.
WUIC11	Disapprove	The proposal adds a requirement exterior surfaces of exterior walls be noncombustible for 6 inches vertically from ground or decking.	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.
WUIC13	Disapprove	The proposal revises exterior wall requirements to separate flame propagation and flame impingement performance requirements.	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.
WUIC15	**Disapprove**	**The proposal revises attic and vent requirements to require vents in IR-1 and IR-2 construction be tested to ASTM E2886 and listed or be non-combustible corrosion-resistant mesh with 1/8 inch spacing,**	**The proposal could increase cost and limit ventilation options as tested and listed products are not available for all types of attic and foundation vents, and are more expensive than simply using a tighter mesh spacing. The requirements have been extrapolated far beyond what is recommended by the referenced IBHS research.**

Note: Proposals in Bold are high priority.