

National Association of Home Builders

2026 ICC Online Governmental Consensus Voting Resource

NAHB.org/CodeDevelopment

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National Association
of Home Builders



NAHB's Voting Recommendations for the 2026 Online Governmental Consensus Vote

This voting resource identifies code change proposals that will have a significant impact on the housing industry. The National Association of Home Builders encourages Governmental Member Voting Representatives to review the recommended positions and associated reasons before casting votes. The recommended positions are intended to result in new codes that support safe and affordable housing.

Each proposal includes a brief description, a recommended vote and supporting reasons for that position. They are listed in numerical order, and the recommended vote is formatted to match the manner in which it is presented in the cdpACCESS™ ballot.

Please note that NAHB has also identified critical code changes that will have a serious impact on the enforcement and adoptability of the 2027 codes. These high-priority proposals are shown in **bold** as they appear in the rest of this voting guide.

For further information on NAHB's voting recommendations please go to www.NAHB.org/CodeDevelopment.

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

Administrative Provisions

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
ADM22, Part 2	Disapprove	This proposal emulates the proposed requirements for alternate materials and applies them to modifications.	Unnecessarily raises the bar for modification compliance. Existing text is more appropriate to address residential applications.

International Building Code – Egress

E24	As Modified (AMC2)	This proposal revises several sections and adds new sections of chapter 10 to allow single means of egress in R-2 residential buildings up to 6-stories in height.	Permits a building of up to 4-stories with single exit stairways, and 4 dwellings per story.
E117	As Submitted	This proposal adds a third exception clarifying that Groups R-2, R-3 or R-4 occupancies containing Accessible, Type A or Type B Units, including accessory occupancies in accordance with Section 508.2 shall be provided with no fewer than one accessible public entrance.	Proposal aligns the number of required accessible entrances for Groups R-2, R-3 or R-4 occupancies containing Accessible, Type A or Type B Units with the minimum federal requirement.

International Existing Building Code

EB52, Part 1	As Modified by Public Comment 1	The proposal would prohibit elevating buildings with slab-on-grade foundations and supporting them on new foundation walls, columns or piers, without first assessing the existing slab and strengthening as required.	The proposal ensures if existing slab-on-grade foundations are used to elevated buildings in flood hazard areas structural integrity is considered and failures do not occur due to inadequate reinforcement. Approved comments removed references to ACI standards to not preclude other methods of evaluation and strengthening and to coordinate with efforts to consolidate flood resistance requirements in Chapter 3 of the IEBC.
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International Fire Code

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
F45	Disapprove	This proposal deletes the current requirements for posts and other barriers and replaces them with chapter 12 requirements for ESS protection in garages. Expands IFC scope to include IRC buildings.	Brings in IRC-scoped buildings which violates IFC Section 102.5. Information is already adequately covered in IRC Section R330.
F108	Disapprove	Proposal requires an automatic sprinkler system in all public garages, other than private garages.	This requirement is much more restrictive than current code and will have wide-ranging negative impacts on the affordability of new multifamily construction. It incentivizes creating separate visitor parking outside of a parking garage which will increase the area of impervious surfaces.
F162	Disapprove	Proposal introduces post-fire repair, reconstruction and newly imposed sprinkler requirements. It focuses on fire sprinkler installation in post fire events.	Introduces a beat-the-clock scenario encouraging construction to be rushed to avoid the requirement to install a sprinkler system and incentivizes permit applicants to pester the Building Dept. to complete permit review in a timely manner. 25% and 60 days are arbitrary numbers which are not based on any studies or any other technical justification whatsoever.

International Building Code – General

G45, Part 2	Disapprove	This proposal revises IFC section 102.5 to state that certain IFC sections apply to residential occupancies. When applying these sections, one-and-two-family dwellings and/or townhouses, built in compliance with IRC, shall be regulated as group R occupancies.	The scope of the IFC should not be expanded to include issues already addressed in the IRC. The IRC is designed to be a stand-alone code, so no correlation with the IRC is needed.
G143	Disapprove	This proposal adds new exceptions and text that will require openings to provide natural light into all living, dining, and sleeping rooms with a floor area of 70 square feet (6.5 m2) or more in group R, I-1 and I-2 occupancies, as well as in I-4 and E occupancies	Adds a requirement to provide natural and artificial lighting in habitable spaces of all Group R occupancy.
G195, Part 1	As Modified by Public Comment 1	This proposal adds the 1200, 1205 and 1210 ICC standards for off-site construction into the code and creates a new section in chapter 31 for modules and modular components.	One obstacle to modular construction is the patchwork of state and local regulation for modular manufacturing and compliance with the building code. This proposal provides a pathway to standardize modular construction by bringing the ICC 1200, 1205 and 1210 off site modular standards into the IBC by reference.

International Residential Code – Building

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
RB35	As Modified by Public Comment 1	This proposal adds provisions for occupiable roofs.	This proposal provides reasonable guidance as to what constitutes an occupiable roof, how large the stair penthouse can be, and when it is not considered a story. The language takes the committee's and testifier's comments into account.
RB51	As Modified by Public Comment 1	The proposal replaces Section R306.1 with general requirements for flood-resistant construction with new text splitting the requirements into a numbered list and adds a new Section R306.4 for repairs, alterations, additions and foundations of existing buildings and structures.	The proposal clarifies requirements for repairs, additions and alterations to existing dwellings in flood hazard areas. Approved comments removed a requirement to replace exterior equipment or appliances due to flood be elevated, coordinated language on elevated slabs-on-grade with the IEBC, and limited the application of substantial damage and substantial improvement requirements to special flood hazard areas (100-year floodplains).
RB63	As Modified by Public Comment 1	This proposal reformats Section R302.2 on fire-resistant construction for townhouses and adds a table with prescriptive assemblies and their fire-resistance ratings.	Providing prescriptive assemblies for light wood and steel and masonry construction makes the code easier to use and enforce.
RB118	Disapprove	This proposal requires frost protection for exterior landings, decks, balconies, stairs and similar facilities at the required egress door.	This is more restrictive than the IBC and does not align with exceptions for footings elsewhere in the code (for example, R507.3). It would apply in all regions despite a lack of data showing it to be a widespread problem. It requires deep excavation in disturbed soil and does not allow for support systems other than footings.

International Building Code – Structural

S97, Part 6	Disapprove	The proposal adds definitions related to flood hazard areas and flood resistance to the IRC. A definition for 500-Year Floodplain is included in the proposed definitions, and the term is added in the definition of Flood Hazard Area.	Adding a definition for 500-year floodplain and including the term in Flood Hazard Area has the effect of extending flood-resistant construction requirements out to the 500-year floodplain and requiring elevation to 500-year flood depths.
S97, Part 7	Disapprove	The proposal modifies numerous IRC sections to state "flood hazard areas" include special flood hazard areas and 500-year floodplains. A new Table R306.1.4 is added for determination of the 500-year elevation. Section R306.2.2 is revised to require an exterior door at the top of stairs providing access to the building.	Extending flood-resistant construction requirements out to the 500-year floodplain and requiring elevation to 500-year flood depths exceed the regulatory minimum construction standards under the NFIP. Home Innovation Research Labs estimated a cost of \$4,800 to \$7,900 to elevate the building pad for a home one foot on fill and \$6,400 to \$12,200 to elevate a home one foot on a backfilled stem wall and footing in lieu of a slab-on-grade foundation. These costs are 3 times higher than claimed by the proponents.
S107	As Modified by Public Comment 2	The proposal adds a new section exempting modular construction done in a manufacturing plant and complying with the QA/QC provisions ICC 1200 and 1205 from needing special inspections during fabrication.	The 3rd-party inspection program and enforcing agency oversight defined in ICC 1205 is similar to a special inspection program. A modular manufacturer should be able to obtain a similar exemption from needing a parallel set of 3rd-party special inspections as a fabricator certified under an industry QA/QC program. Approved comments require the inspection program defined in ICC 1205 to include the special inspections and tests defined in Chapter 17.

Prop #	Recommended Vote	Proposal/Comment Description	Reason Statement
S153	As Modified by Public Comment 3	The proposal adds a definition for Salvage Lumber and a new Section 2303.1.1.3 for the use of salvage lumber structural applications. Salvage lumber with an existing grade mark can use 90% of AWC NDS values. Salvage lumber without a grade mark requires a certificate of inspection.	The proposal would expand the supply of lumber in the marketplace for residential construction by providing a path for the re-use of lumber salvaged from existing buildings. The approved comments consolidate the provisions for salvaged lumber with and without an existing grade mark and require grading by or a certificate of inspection from a certified grading agency.
S159	Disapprove	The proposal adds new Sections 1402.11, 2304.3.3.1 and 2510.8 requiring exterior cladding be designed and constructed to accommodate vertical framing shrinkage.	The proposal could lead to building officials requesting explicit documentation the design has accommodated shrinkage. While it is important that the exterior cladding and structural system are compatible, no substantiation was provided of a concern with life safety or the performance of the primary structure. The comment further expanded shrinkage considerations to all elements considered an exterior wall covering such as a water-resistive barrier, not just the outermost cladding or siding.

International Wildland Urban Interface Code

WUIC12	Disapprove	This proposal relocates requirements for Fire Protection Plans from Chapter 4 to Chapter 6 and expands the details on the project required to be provided on the plan. The plan must be prepared by a registered design professional, qualified landscape architect, qualified fire safety specialist, or similar qualified professional.	The proposal requires a separate and duplicative plan though much of the required information would be on a typical site plan. Liability is created by requiring legally binding statements on other parties the design professional or specialist have no control over. No cost estimate is [provided for retaining a professional to prepare preliminary and final plans. The proposal will definitely increase cost outside of California.
WUIC44	As Modified by Public Comment 1	This proposal modifies Sections 504.7.1 and 505.7.1 to require all underfloor areas of unenclosed accessory structures and projections from habitable buildings be enclosed or protected with noncombustible or ignition-resistant materials or fire-retardant-treated wood and adds similar new similar requirements to Section 506.	The proposal enhances protection requirements for underfloor areas of unenclosed accessory structures and projections. Approved comments clarify the space does not have to be enclosed with an entire exterior wall assembly, where and how the requirement for 6" of noncombustible material up from grade is provided on supporting walls and columns, and correlate with other approved changes for the 2027 IWUIC.
WUIC54	Disapprove	This proposal replaces the Class 1 wildfire-resistant construction requirements in Section 504 with provisions from California Building Code Chapter 7A including new provisions for roof covering gaps, protection of open eaves, and exterior wall coverings. Acceptance criteria for testing wall assemblies and materials to ASTM E2957, E2632, E2726 and E2707 are added.	The proposal replaces the existing Class 1 requirements with more stringent California Building Code wildfire requirements. Approval would overwrite technically justified improvements and editorial clarifications approved during the Committee Action Hearings and which went to the consent agenda. The proposal has numerous poorly written provisions and uses colloquial terms such as "bird stops", "mudded", and "boxed-in" that are not used elsewhere in the I-Codes.